

Superior Court of the State of California
For the County of Los Angeles

CHURCH OF SCIENTOLOGY OF
CALIFORNIA,

Plaintiff,

vs.

GERALD ARMSTRONG, DOES 1
through 10, inclusive,

Defendants.

MARY SUE HUBBARD,

Intervenor.

No. C 420,153

VOLUME III

DEPOSITION OF GERALD ARMSTRONG

Woodland Hills, California

October 28, 1983

ORIGINAL

Sylvia Becker & Associates, Inc.

CERTIFIED SHORTHAND REPORTERS

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES
3

4 CHURCH OF SCIENTOLOGY OF CALIFORNIA,)

5 Plaintiff,)

6 v.)

7 GERALD ARMSTRONG, DOES 1 through)
8 10, inclusive,)

9 Defendants.)

NO. C 420,153

10 MARY SUE HUBBARD,)

11 Intervenor.)

12
13 VOLUME III, DEPOSITION OF GERALD

14 ARMSTRONG, taken on behalf of the
15 Intervenor Mary Sue Hubbard at 5855
16 Topanga Canyon Boulevard, Suite 400,
17 Woodland Hills, California 91367, at
18 10:15 a.m., Friday, October 28, 1983,
19 before RUTH PERSKY, CSR 5673, a Notary
20 Public in and for the County of Los
21 Angeles, State of California, pursuant to
22 Stipulation.
23

24 --oOo--

25
26
27 Reported by: RUTH PERSKY, CSR 5673

28 Deposition No.: 83-534

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2 APPEARANCES:

3
4 For the Plaintiff:

5 LAW OFFICES OF HOWARD J. STECHEL
6 (NOT PRESENT)
7 6255 Sunset Boulevard
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9 Los Angeles, California 90028

10
11 For the Defendant:

12 CONTOS & BUNCH
13 BY: JULIA DRAGOJEVIC, ATTORNEY AT LAW
14 5855 Topanga Canyon Boulevard
15 Suite 400
16 Woodland Hills, California 91367

17 For the Intervenor:

18 LAW OFFICES OF BARRETT S. LITT
19 BY: MICHAEL S. MAGNUSON, ESQ.
20 617 South Olive Street
21 Suite 1000
22 Los Angeles, California 90014

23 Also Present:

24 KENNETH LONG
25
26
27
28

I N D E XWITNESSEXAMINATIONPAGE

GERALD ARMSTRONG
VOLUME III

By Mr. Magnuson

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UNANSWERED QUESTIONSPageLine

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1 WOODLAND HILLS, CALIFORNIA, FRIDAY, OCTOBER 28, 1983

2 10:15 A.M.

3
4 GERALD ARMSTRONG,

5 called as a witness on behalf of the Intervenor, having been
6 first duly sworn, was examined and testified further as
7 follows:
8

9 EXAMINATION

10 BY MR. MAGNUSON:

11 Q Mr. Armstrong, can you state your name and
12 address for the record, please.

13 A Gerald Armstrong, P.O. Box 10173, Costa Mesa,
14 California 92627.

15 Q Does that mean you are not stating your
16 residence address?

17 A That's correct. You know it anyway.

18 Q I'm going to dispense with the usual
19 admonitions since this is a continuing deposition if that's
20 all right with you.

21 A Sure.

22 Q Before we begin I do want to go through for
23 the record the documents which we originally requested that you
24 produce to make sure that everything we have requested
25 previously has been produced.

26 A We've had a whole bunch of documents here on a
27 number of occasions.

28 Q That's right. I'm going to ask you whether you

1 presently have any of these documents that have not been
2 produced, that is, since the last deposition.

3 A. Since everything was laid out here --

4 Q. Why don't you let me ask the questions.

5 Do you have with you today any documents, notes,
6 memoranda, correspondence, calendars, diaries, or any other
7 written material relating to the ownership of the documents
8 under seal in the Superior Court in this matter? Do you have
9 with you today any of such documents?

10 A. Let's get some definitions. By "with me today,"
11 do you mean here in this room?

12 Q. Yes, I do.

13 A. I don't have anything but this yellow pad. So
14 if that handles your questions --

15 Q. Do you have any such documents that I've just
16 referred to that have not already been turned over to
17 plaintiff?

18 A. Not to my knowledge.

19 Q. Point 2 requests you to produce any and all
20 documents, notes, memoranda, correspondence, calendars,
21 diaries or other written material relating to the right to
22 possession of the documents currently under seal. Do you have
23 any such documents here today?

24 A. No.

25 Q. To your knowledge do you have any documents
26 that have not already been turned over to plaintiff and
27 intervenor?

28 A. I don't -- not to my knowledge.

1 Q Request No. 3 is to produce any and all
2 documents, notes, memoranda, correspondence, calendars,
3 diaries, or other written material relating to the subject
4 of Scientology or L. Ron Hubbard. Do you have any of those
5 here today?

6 A No.

7 Q Do you have any such documents that have not
8 already been produced?

9 MS. DRAGOJEVIC: Can I have that one reread.

10 MR. MAGNUSON: That's any and all documents, notes,
11 memoranda, correspondence, calendars, diaries, or other
12 written material relating to the subject of Scientology or
13 L. Ron Hubbard.

14 MS. DRAGOJEVIC: I believe we brought to the
15 deposition a couple of times a bin of books and brochures,
16 things of that nature which I think are still in the office
17 if you would like to see them.

18 MR. MAGNUSON: Okay. That's fine. I'm familiar with
19 those.

20 THE WITNESS: We've had here a couple of times a few
21 stacks of junk which I don't know if anybody went through.

22 MS. DRAGOJEVIC: They were comprised mainly of books,
23 brochures, pamphlets, things of that nature; no written letters
24 or anything like that.

25 MR. MAGNUSON: That's fine. I remember looking at
26 those last time.

27 MS. DRAGOJEVIC: Okay.

28 / / /

1 BY MR. MAGNUSON:

2 Q If there's nothing else, we can go on to the
3 next thing.

4 No. 4, any and all correspondence and other
5 material reflecting or relating to communications between
6 yourself and L. Ron Hubbard. Do you have any such documents
7 here today?

8 A. No.

9 Q Do you have in your possession or in your
10 attorneys' possession any such documents that you've not
11 already made available?

12 A. Not to my recollection.

13 Q Point No. 5, any and all correspondence and
14 other material reflecting or relating to communications between
15 yourself and any press or media representative which relates
16 to the subject of Scientology or L. Ron Hubbard. Again, do
17 you have any such correspondence here today?

18 A. No.

19 MS. DRAGOJEVIC: We turned over whatever we had in
20 that category.

21 BY MR. MAGNUSON:

22 Q And there hasn't been subsequent to your having
23 turned that material over any additional such documents; is
24 that right?

25 A. Right.

26 Q Point No. 6, any and all correspondence or
27 other material reflecting or relating to communications between
28 yourself and any present or former member of any Scientology

1 organization. Do you have any such correspondence or other
2 material reflecting such communications here today?

3 A. No.

4 Q. Have you acquired since the last date of your
5 deposition any such correspondence?

6 A. Yes.

7 Q. You have presently in your possession some
8 correspondence that fits into this category?

9 A. Yes.

10 MR. MAGNUSON: Will counsel produce?

11 MS. DRAGOJEVIC: I haven't seen it. I'm going to
12 have to take a look at it first.

13 MR. MAGNUSON: Well, will you represent that you will
14 look at this and let me know whether you are willing to
15 produce it or not?

16 MS. DRAGOJEVIC: Sure, I'll look at it.

17 BY MR. MAGNUSON:

18 Q. No. 6, any and all correspondence or other
19 material reflecting or relating to communications between
20 Gerald Armstrong and Ronald DeWolf. Do you have any such
21 correspondence here today?

22 A. No.

23 Q. Is there any such correspondence that you have
24 other than what has already been turned over that is in the
25 possession of your attorneys?

26 A. No.

27 Q. Point No. 7, any and all correspondence or
28 other material reflecting or relating to communications

1 between Gerald Armstrong and Omar Garrison. Do you have any
2 such communications here today?

3 A. No.

4 Q. Do you have any correspondence or other
5 information reflecting such communication?

6 MS. DRAGOJEVIC: It's been turned over.

7 BY MR. MAGNUSON:

8 Q. That has not already been turned over.

9 THE WITNESS: What? Correspondence from Omar
10 Garrison?

11 BY MR. MAGNUSON:

12 Q. Right.

13 A. I don't think there's anything.

14 Q. That is, assuming that everything had
15 previously been turned over, you have not since the last time
16 you produced these materials acquired any such correspondence;
17 is that your testimony?

18 A. I think I got a note from his wife.

19 Q. Would that be the only thing that you can
20 recall?

21 A. I believe so.

22 Q. Did the note from his wife have anything to
23 do with this case or the documents?

24 A. No.

25 Q. Point 8, any and all correspondence or any
26 material reflecting or relating to communications between
27 yourself and any persons professing to be knowledgeable about
28 or hostile to Scientology, including Paulette Cooper, John

1 Clark, and Margaret Singer. Do you have any such
2 correspondence in your possession today, here?

3 A. No.

4 Q. Do you have in your possession any such
5 correspondence that has not already been made available to the
6 other parties in this litigation?

7 A. Yes.

8 Q. Are you prepared to make available --

9 A. No --

10 MS. DRAGOJEVIC: I'm going to have to take a look at
11 whatever it is.

12 MR. MAGNUSON: Let the record reflect that I've
13 requested Mr. Armstrong's counsel to review these materials
14 and advise me whether they are prepared to produce them without
15 formal request.

16 Q. Point No. 9, any and all correspondence or
17 other materials reflecting or relating to communications with
18 anyone other than with your own attorney, which is subject to
19 the attorney-client privilege, regarding the personal property
20 which is the subject of this case. Do you have any such
21 correspondence here today?

22 A. No.

23 Q. Do you have in your possession any
24 correspondence --

25 A. No.

26 Q. That is correspondence with any individual
27 other than with your attorneys having to do with the subject
28 matter of this action?

1 A. No.

2 Q. All right. Let me say that the principal area
3 of inquiry today is I want to go through these documents and
4 ask you certain specific questions about specific documents.
5 A couple of loose ends I want to cover first before we get into
6 that.

7 Mr. Armstrong, as you sit here today, do you
8 make any claim to be the personal representative of L. Ron
9 Hubbard?

10 A. At this point?

11 Q. Yes.

12 A. No.

13 Q. As you sit here today, do you make any claim
14 to have the right to possess the documents under seal by
15 virtue of the biography contract between Scientology Publishing
16 Company and Omar Garrison?

17 MS. DRAGOJEVIC: I'd like to have that question read
18 back, please, Miss Reporter.

19 (Record read.)

20 BY MR. MAGNUSON:

21 Q. You can answer the question.

22 A. I can't answer that.

23 Q. Why can't you answer that?

24 A. I don't know what the question means.

25 Q. You don't understand the question?

26 A. No.

27 Q. Okay. You are aware, are you not, that there
28 was a contract between a Scientology publishing company, AOSH

1 DK, and Omar Garrison under which Mr. Garrison would write a
2 biography of Mr. Hubbard? You are aware of that?

3 A. Yes.

4 (Discussion between the witness and
5 his counsel.)

6 BY MR. MAGNUSON:

7 Q. You have previously testified, have you not,
8 that you transferred documents from the Church of Scientology's
9 archives area to Mr. Garrison for his purposes in preparing
10 that biography pursuant to that contract?

11 A. No.

12 Q. You have not testified to that?

13 A. No.

14 Q. Is it true that you did transfer to
15 Mr. Garrison documents that were in the church's archives area
16 for purposes of Mr. Garrison's preparation of that biography?
17 Is that an accurate statement?

18 A. No. They were Hubbard's archives;

19 Q. I'm talking about transferred physically from
20 the church's archives area. I'm not saying whether they are
21 the church's archives or Hubbard's archives, but they were
22 stored in the church's archives area.

23 A. No, that's not correct. You and Mr. Litt
24 perhaps don't understand that there are various groups within
25 the organization of Scientology. I did not have access to the
26 church archives. Church archives is something else. I had
27 Hubbard's archives. So if you were to call them the Hubbard
28 archives, then --

1 Q. Let's say the materials that you characterize
2 as the Hubbard archives which at the time you came into
3 possession of them were housed at the Cedars' complex. And you
4 transferred these documents to Mr. Garrison; is that accurate?

5 A. Yes.

6 Q. And you transferred those documents to
7 Mr. Garrison for his use in preparing the biography of
8 Mr. Hubbard; is that accurate?

9 A. That's correct.

10 Q. And that biography that Mr. Garrison was
11 working on was pursuant to a contract between himself and
12 AOSH DK; is that correct?

13 A. That's correct.

14 Q. So my question is do you make any claim to the
15 right to possession of these documents by virtue of that
16 contract between AOSH DK and Mr. Garrison? In other words,
17 does that contract provide for you to have possession of these
18 documents in some explicit or implicit way?

19 MS. DRAGOJEVIC: I'm going to object as calling for a
20 legal conclusion. Are you asking him to interpret a contract
21 that you don't even have here for him to read?

22 MR. MAGNUSON: I'm asking him to give his opinion as
23 to whether he continues to be acting pursuant to that contract.
24 He has testified earlier that he did.

25 MS. DRAGOJEVIC: That wasn't the question. I don't
26 know what you are trying to get at, then. That was not the
27 request contained in that question as far as I could see. To
28 me it was a request that he interpret the terms of the contract

1 to see whether he is in some way a part of that contract, and
2 I think it calls for a legal conclusion.

3 I'm going to instruct him not to answer. We
4 don't even have the contract here for him to read.

5 BY MR. MAGNUSON:

6 Q Let me ask you this: To your knowledge, is
7 there a contract presently in existence between Mr. Garrison
8 and AOSH DK, to your knowledge?

9 A I don't know.

10 Q You are aware, are you not, that Mr. Garrison
11 and the successor to AOSH DK, New Era Publications, reached an
12 agreement under which that original contract was declared null
13 and void? You are aware of that, are you not?

14 MS. DRAGOJEVIC: I'll object to the question as
15 calling for speculation.

16 MR. MAGNUSON: Why does it call for speculation?
17 I'm asking if he knows that. If he doesn't know, he can say
18 that.

19 MS. DRAGOJEVIC: I didn't instruct him not to answer.

20 THE WITNESS: I know that there was a settlement of
21 some kind. The terms of the settlement I don't know.

22 BY MR. MAGNUSON:

23 Q But it is your understanding that that contract
24 is no longer in existence?

25 A As far as Mr. Garrison is concerned, I believe
26 that to be true.

27 Q What do you mean "as far as Mr. Garrison is
28 concerned"?

1 A. His work relative to that contract. He's no
2 longer doing the biography. That's what I know to be true.

3 Q. So Mr. Garrison is no longer writing a
4 biography pursuant to that contract; is that correct?

5 A. That's correct.

6 Q. And as far as you know, that contract is no
7 longer in existence, is that correct, to your knowledge?

8 MS. DRAGOJEVIC: If you know, Gerry.

9 THE WITNESS: I don't understand what that means.
10 BY MR. MAGNUSON:

11 Q. Is it your understanding that that contract
12 has now been declared null and void by the parties who entered
13 into it?

14 A. Yes.

15 Q. So it's your understanding that there is
16 presently no contract between a Scientology publishing company
17 and Mr. Garrison for purposes of Mr. Garrison writing that
18 biography as far as you know?

19 MS. DRAGOJEVIC: If you know. Could be another one.

20 THE WITNESS: I don't know of any other.
21 BY MR. MAGNUSON:

22 Q. That's right. But as far as you know, there
23 is no contract presently in existence?

24 A. Right.

25 Q. Let me return briefly to the situation that
26 you've testified to earlier about having prevented from
27 destruction certain materials that had been stored in the
28 R-storage. You are familiar with that general situation?

1 A. Yes.

2 Q. Is it your testimony that when those documents,
3 were, to use your term, saved by you, that they became your
4 personal property at that point?

5 MS. DRAGOJEVIC: I don't understand the question. Do
6 you mean ownership? Do you mean possession? What do you mean?
7 BY MR. MAGNUSON:

8 Q. I mean ownership. Did these become your
9 personal property in the same way as if you went to the store
10 and bought a loaf of bread; that loaf of bread became your
11 personal property?

12 A. No, I did not understand that.

13 Q. So when this incident regarding the materials
14 at Gilman Hot Springs that you have testified to as having
15 participated in preventing these from being destroyed, those
16 did not at that point become your personal property; is that
17 correct?

18 A. That's correct.

19 Q. Now, the archives post that you held -- what
20 we've referred to as the archives post, or I guess it's as
21 researcher which I'm using interchangeably -- when you held that
22 post, did you consider that a position of trust?

23 MS. DRAGOJEVIC: I'm going to have to object. I have
24 a feeling that these questions have been asked, specifically
25 that one, and I think they have been asked over and over in the
26 four other depositions. I'm afraid I'm going to have to look
27 through transcripts because I'm not going to have him sitting
28 here, answering the same questions he's answered before.

1 Obviously you weren't present at the first
2 three depositions so there might be a problem. I don't know
3 if you've read all the transcripts.

4 MR. MAGNUSON: That's understandable, and I'm not
5 trying to repeat inquiry that has already taken place.

6 MS. DRAGOJEVIC: I'm almost certain that that question
7 has been asked in the past, and if necessary I'll look through
8 the volumes because I don't want him to answer questions that
9 he's already answered.

10 This has gone on long enough. This is the
11 fifth day. So maybe we should get to the heart of what you
12 are looking for with respect to identification of documents,
13 because we're repeating areas that have been gone over and gone
14 over.

15 MR. MAGNUSON: Well, if you want to instruct him not
16 to answer -- this is my last question along these lines. If
17 you want to instruct him not to answer and look it up to see
18 whether it's been asked before, we can wait. My intention
19 isn't to repeat, to go over ground that has already been
20 covered.

21 MS. DRAGOJEVIC: Well, for the time being I'm going
22 to instruct him not to answer, and you can go on.

23 MR. MAGNUSON: Let me just take a minute here.

24 MS. DRAGOJEVIC: Okay.

25 (Off the record.)

26 MR. MAGNUSON: Back on the record.

27 Q Are you familiar, Mr. Armstrong, with a
28 document or file that's labeled "Affirmations"?

1 A. That's pretty broad.

2 Q. Well, maybe you can explain it to me. Was
3 there within the archives materials that you were working with
4 while you held the archives position some documents that had
5 been labeled or identified "Affirmations"?

6 A. That's correct.

7 Q. Can you explain to me what these were.

8 A. The affirmations were handwritten materials,
9 handwritten by L. Ron Hubbard, which went over various of his
10 problems, and they were self-hypnotic commands that he was
11 writing to himself, affirmations. And they were from the late
12 1940s, and they referred to his war career, his physical and
13 mental condition, that sort of thing.

14 Q. Then, were these separate documents, or were
15 they all one document? How were they physically compiled?

16 A. They were assorted. There's a number from
17 the same kind of period or same style of writing.

18 Q. And these were handwritten --

19 A. Yes.

20 Q. -- by Mr. Hubbard?

21 A. Yes.

22 Q. And were they gathered together by you and
23 put into one file or stored together, or did you receive them
24 in that same form?

25 A. They were either in one area or one box,
26 something like that. They were roughly together.

27 Q. And these were in the nature of personal
28 notes or personal thoughts or ideas? Is that essentially what

1 these documents consisted of?

2 A. Personal writings.

3 Q. Approximately how many different documents are
4 we talking about?

5 A. Maybe six.

6 Q. And they all come roughly from the late 1940's
7 period?

8 A. Yes.

9 Q. While you were holding the archives post,
10 where did you obtain these documents?

11 A. They originally came from the boxes in Del
12 Sol on the Gilman Hot Springs property.

13 Q. And did you transfer those materials to
14 Mr. Garrison?

15 A. Yes.

16 Q. Approximately when did you make that transfer?

17 A. I don't recall. Sometime I guess in 1981.

18 Q. That was while you were holding the archives
19 post?

20 A. Yeah.

21 Q. Do you know if there are documents in there
22 that contain the term "blood ritual"?

23 A. I believe so, yes.

24 Q. Did you read all these documents?

25 A. Yes.

26 Q. Did you subsequently send these materials to
27 Mr. Flynn?

28 A. I don't know if I sent them to him. I possibly

1 did. I -- I possibly did.

2 Q Well, let me ask you this: Did you obtain from
3 Mr. Garrison -- subsequent to having delivered them to
4 Mr. Garrison, did you then go back and obtain them again from
5 Mr. Garrison?

6 A Yeah, I borrowed them for copying.

7 Q So you borrowed these documents from
8 Mr. Garrison, made copies, and then returned the originals to
9 Mr. Garrison? Or did you retain the originals?

10 A No. He had the originals.

11 Q So you took them, copied the original
12 documents, returned the originals, and retained in your
13 possession the copies?

14 A Yes. I am pretty sure that that's the way it
15 was.

16 Q When did this approximately take place?

17 A Sometime in the spring of '82.

18 Q Did you send copies of those documents to
19 anybody other than Mr. Flynn?

20 A I think -- well, I think a copy went to Contos
21 & Bunch. I think but I'm not certain.

22 Q So you made, have made more than one copy?

23 A Possibly. I seem to recall, but I'd have to
24 check archives or what's under seal to be sure.

25 Q Other than sending a copy to Mr. Flynn and
26 possibly sending a copy to Contos & Bunch, did you make
27 available to anybody else copies of these materials?

28 A No.

1 Q You don't have possession of these materials
2 presently in your possession?

3 A No.

4 Q Did you show anybody, as far as you can recall,
5 any of these documents?

6 A Yeah.

7 Q Who did you show those two?

8 A Jim and Nancy Dincalci and David Brown.

9 Q And approximately when did that take place?

10 A Those were the only ones.

11 Oh, May, June, July, sometime in the --
12 probably in the summer of '82.

13 Q Do you know whether anybody that you gave a
14 copy to, which from your testimony would be Mr. Flynn and
15 possibly Contos & Bunch, made a copy of this document available
16 to anybody else --

17 A No.

18 Q -- to your knowledge? You don't know if
19 anybody did?

20 A I don't know.

21 Q What was your purpose in sending these
22 materials to Mr. Flynn?

23 A I think that there's a lot of --

24 MS. DRAGOJEVIC: I'm going to --

25 THE WITNESS: A lot of motives --

26 MS. DRAGOJEVIC: Go ahead.

27 BY MR. MAGNUSON:

28 Q Tell me what those are.

1 A. Well, to begin with, the idea of contacting
2 Mr. Flynn began when I feared for my life, and so to some
3 degree I certainly acted out of terror that I was going
4 through at the time. So I sought his legal advice.

5 Q. What did these particular documents have to do
6 with your concern?

7 A. These documents were a part, at least, of
8 the deprogramming process that I had gone through when they
9 revealed a great number of the lies that Hubbard had spoken,
10 written, published about himself, and they were a part, at
11 least, of any defense against the organization.

12 I knew I was talking to -- I sought advice.
13 I sought defense. I sought protection.

14 Q. But I don't think that's responsive to my
15 question. My question was why did you send those particular
16 documents to Mr. Flynn? I understand from your testimony that
17 seems to be a reason for having consulted Mr. Flynn. My
18 question is what did these particular documents have to do
19 with that?

20 A. I think I answered that.

21 MS. DRAGOJEVIC: I do, too. He just went through a
22 lengthy answer about the fact that the documents played a part
23 in his deprogramming and showed him the truth about lies that
24 he had previously read.

25 BY MR. MAGNUSON:

26 Q. Did you send these to Mr. Flynn for purposes
27 of the biography project? Did your sending these to Mr. Flynn
28 have any relationship at all to the biography project?

1 A. Certainly.

2 Q. What was that relationship?

3 A. I had copies of them because of, in part at
4 least because of Omar's fear that the organization was going
5 to burglarize his place, steal everything he had, and thus
6 prevent him from publishing. So it all tied in. Mr. Garrison
7 was very fearful as to what was going to be done to him.

8 Q. So is it your testimony that you sent these
9 affirmations to Mr. Flynn for purposes of furthering the
10 biography project?

11 A. I think that I've testified as to several
12 motivating factors which went into the decision. Perhaps this
13 was another one. I saw that Omar Garrison had been targeted
14 by the organization. They were pretending that Hubbard had
15 nothing to do with the biography. They were acting apparently
16 autonomously, denying that his relation --

17 Q. Mr. Garrison didn't ask you to send these to
18 Mr. Flynn for safekeeping, did he?

19 MS. DRAGOJEVIC: I'm going to object to this line of
20 questioning. This has been answered. We've gone over why the
21 documents were sent to Mr. Flynn and Contos & Bunch in prior --

22 MR. MAGNUSON: But we haven't gone over with
23 particularity. I'm concerned there may be particular reasons
24 in relation to certain documents which may be different from
25 the general approach. See what I mean? I agree he's testified
26 in general as to various reasons as to having sent these to
27 Mr. Flynn, but I want to find out if there is any particular
28 reason why a particular document was sent as opposed to some

1 other document. That's the reason for this inquiry.

2 MS. DRAGOJEVIC: Well, you have got the general
3 reason. I can't see how the general reason wouldn't apply to
4 the specific. At least that's my view of it. But go ahead.

5 MR. MAGNUSON: Is there a question pending?

6 (Record read as follows:

7 "Q. Mr. Garrison didn't ask you to send
8 these to Mr. Flynn for safekeeping, did he?")

9 MS. DRAGOJEVIC: Thank you. I remember what else I
10 wanted to say.

11 I think Mr. Armstrong has also testified --
12 in fact I believe it was during the last session of his
13 deposition -- that he advised Mr. Garrison that he was sending
14 the materials, and he testified as to the substance of their
15 conversations and as to the parameters of what Mr. Garrison
16 felt Mr. Armstrong could do with the documentation, et cetera.

17 MR. MAGNUSON: Well, let me ask the question this way;
18 then we can avoid having to go over it repeatedly.

19 Q. Mr. Garrison did not tell you to send documents
20 to Mr. Flynn for safekeeping, did he?

21 That's a "Yes" or "No" answer.

22 MS. DRAGOJEVIC: He's thinking.

23 THE WITNESS: On the subject of safekeeping, I don't
24 know if he had that in mind when he said my defense.

25 BY MR. MAGNUSON:

26 Q. My question: Did Mr. Garrison ask you to send
27 these documents to Mr. Flynn for safekeeping?

28 A. No.

1 Q Just to make sure we're clear, we're talking
2 about any of the documents not just this particular document;
3 correct?

4 A Right. He told me --

5 Q That's fine.

6 A -- that I could use the documents in my
7 defense. He knew that I was sending them to Mr. Flynn.

8 Q That's right. I understand that from your
9 previous testimony.

10 A We understood together that they were certainly
11 safer there than they were anywhere else. They were safer
12 with my attorneys. That was the substance of our conversation.

13 Now, he did not specifically send them to
14 Flynn for securing --

15 Q That's fine.

16 A -- but we discussed the subject.

17 Q Now, there's another set of materials that
18 were in your possession when you were the archivist which I
19 think were labeled "LRH Letters to Polly" or something along those
20 lines. Are you familiar with those?

21 A Yes.

22 Q Can you explain to me what form those letters
23 were kept? In folders? Separately? Or how were they
24 collected?

25 A Do you want the whole time track on it?

26 Q Let's start with initially while you were the
27 archivist. Where did you get them, and how did you put them
28 together?

1 A. I found them interspersed in a number of boxes
2 in Del Sol, the old condemned hotel at Gilman Hot Springs where
3 Hubbard's personal archives were. They were among probably
4 15 of the 21 boxes.

5 I assembled them into a chronological order,
6 and from that point on began copying them. I made a copy,
7 put it into a binder, and made another copy and put that into
8 a binder which I provided to Omar Garrison.

9 And so there were two copies made of all of
10 what we call "Polly Letters." And one remained, one was given
11 to Omar Garrison. The originals were simply kept chronologi-
12 cally in files, but loose, not bound.

13 Q. So there was one bound set that remained in
14 the archives area --

15 A. That's correct.

16 Q. -- in the church?

17 Were all these put into one binder, or did it
18 require several binders?

19 A. Several binders.

20 Q. How many do you recall?

21 A. Probably seven.

22 Q. And do you know approximately how many letters
23 there were in the seven binders? Your estimate.

24 A. Maybe a couple hundred.

25 Q. And these were letters between L. Ron Hubbard
26 and Polly?

27 A. Yes.

28 Q. Who is Polly?

1 A. Polly is L. Ron Hubbard's first wife.

2 Q During what time period were these letters
3 exchanged?

4 A. 1932 through 1947, '48.

5 Q These were personal letters between
6 Mr. Hubbard and his wife; is that correct?

7 A. That's correct.

8 Q Did you read these letters?

9 A. Yes.

10 Q Approximately when did you take these binders
11 to Omar Garrison, the one set of copies?

12 A. 1980.

13 Q 1980. So it was among the earlier materials
14 you transferred to Mr. Garrison?

15 A. Yes.

16 Q And then did you subsequently after leaving the
17 church go back to Mr. Garrison and make another set of copies
18 of these?

19 A. That's correct.

20 Q And when approximately did that take place?

21 A. Spring of 1982.

22 Q How many sets of copies did you make of these?

23 A. I believe one.

24 Q And did you then send that one set to Michael
25 Flynn?

26 A. What do you mean by "and then"?

27 Q Well, after making copies of these materials,
28 did you send a set to Mr. Flynn?

1 A. What do you mean by "after"?

2 Q. After having obtained them from Mr. Garrison.

3 A. You mean I got them and send them off?

4 Q. Let me ask you this way --

5 A. Let me tell you this. They sat around for
6 several months.

7 Q. But did you at some point send these to
8 Mr. Flynn?

9 A. That's correct.

10 Q. Did you make copies of the binders before you
11 sent them to Mr. Flynn?

12 A. Yes.

13 Q. And then did you send the actual binders that
14 you obtained from Mr. Garrison, or did you send copies of
15 those to Mr. Flynn?

16 A. Run that by me again.

17 Q. Well, you've previously testified that the
18 documents were taken in binder form, approximately seven binders
19 from you to Mr. Garrison in 1980. After leaving the church
20 in December 1981, you went back to Mr. Garrison and obtained
21 possession of these binders. Now, my question is -- well, let
22 me ask this: Did you then make copies of those binders?

23 A. Yes.

24 Q. Did you make one set or more?

25 A. One.

26 Q. And then what did you do with the copies you
27 obtained from Mr. Garrison, and what did you do with the set
28 that you copied from the binders?

1 A. The binders from Mr. Garrison went back to him.
2 The originals were stored with me. I'm sorry. Not the
3 originals. The copies of the copy, the copies of his binders.

4 Q. Let me get this straight. The binders that you
5 obtained from Mr. Garrison you copied. Then did you return
6 the same binders that you had obtained from Mr. Garrison and
7 give those to Mr. Garrison? Or did you give to Mr. Garrison
8 this new set of copies that you just obtained?

9 A. I gave him the first generation copies. I
10 retained the second generation copies.

11 Q. So you retained the copies you had just made
12 at that time?

13 A. Yes.

14 Q. Then did you subsequent to that occurrence
15 send those copies that you retained to Mr. Flynn?

16 A. Yes.

17 Q. And approximately when did you send those to
18 Mr. Flynn?

19 A. I don't -- I have gone over this a hundred
20 times, you know. So if I'm -- if I'm wrong in the month, if
21 I said June before, it was 1982. It could have been June,
22 July. It could have been August, but it's in 1982. All of the
23 documents which I ever sent to Mr. Flynn were in that period.
24 So just --

25 Q. As we go through some of these materials, here's
26 what I'm asking: To the extent that you recall --

27 I know you've already testified that you sent
28 several different times documents between, I believe, May, June,

1 July, and August to Mr. Flynn. My question is when we're
2 talking about a particular document, if you recall, did you
3 send it early or late in that period? I mean some documents
4 were sent in May or early June. Others went in August. To
5 the extent that you can recall a distinction based on these
6 particular documents, that's what I'm asking about.

7 Does that make sense?

8 A. Yeah, but I cannot testify --

9 Q. If you can't recall, that's fine.

10 A. -- with certainty to the point at which --

11 Q. There may be documents that you can remember
12 you sent the first time to Mr. Flynn, or maybe there are
13 documents that you can remember you gave to him much later.
14 So if you can't recall, that's fine. I'm asking to the
15 extent you recall.

16 A. Possibly if I had the documents I could be more
17 clear in terms of the totality of it or the individual
18 documents.

19 Q. Yes. I understand that.

20 (Witness confers with his counsel.)

21 BY MR. MAGNUSON:

22 Q. Did you show these letters or copies of these
23 letters to anybody other than Mr. Flynn?

24 A. I don't believe so.

25 Q. All right. Now, let's discuss the letters
26 between Mr. Hubbard and his mother and father. Do you recall
27 such correspondence coming into your possession while you were
28 in the archives post?

1 A. Yes.

2 Q. And where did you obtain those materials?

3 A. From the Del Sol location and from the
4 Controller archives and from Pers Sec archives.

5 Q. Now, approximately how many letters were there
6 of this nature as far as you can recall?

7 A. I'd say roughly several hundred.

8 Q. And can you estimate how many came from which
9 of these three locations?

10 A. The bulk came from Del Sol and perhaps equal
11 amounts from the other two locations.

12 Q. I see. So approximately 50 percent came from
13 Del Sol, and approximately 25 percent from each of the other
14 two locations?

15 A. Yeah. 70 and 15, 15. It's hard to say.

16 Q. That's fine. Did you then compile these into
17 binder form as well?

18 A. Yes.

19 Q. How many binders did that take up?

20 A. 10.

21 Q. Did you then do the same procedure as you did
22 with the Polly letters, that is, keep the originals in the
23 archives, make a separate copy for the archives, and then
24 transfer a set to Mr. Garrison?

25 A. That's correct.

26 Q. Approximately when did you transfer this set
27 of binders to Mr. Garrison?

28 A. Throughout 1981.

1 Q Do you recall during what time period these
2 letters were exchanged between Mr. Hubbard and his parents?

3 A 1920 through 1974.

4 Q And these were personal correspondence, were
5 they not?

6 A Some and some not.

7 Q What were not?

8 A Anything that had to do with Dianetics.

9 Q There were letters that had to do with
10 Dianetics?

11 A Yeah.

12 Q I'm just trying to get -- these were letters
13 written by Mr. Hubbard to his parents, or were they from the
14 parents to Mr. Hubbard, or a mixture?

15 A I believe both.

16 Q And these were not letters that were meant for
17 public use? They were communications between the parties to
18 the correspondence; is that right?

19 MS. DRAGOJEVIC: Objection. The question is vague
20 and ambiguous. What do you mean by "public use of it"?

21 BY MR. MAGNUSON:

22 Q Well, let me ask it this way: These were
23 personal letters in the sense that if Mr. Hubbard wrote it he
24 was intending for his parents to be the ones that would read
25 it?

26 MS. DRAGOJEVIC: Objection. Calls for speculation as
27 to what Mr. Hubbard intended.

28 THE WITNESS: We would actually have to view the

1 letters. It's been a long time, and all I know is that his
2 father was director of one of the Dianetics groups. Hubbard
3 himself was the -- a director.

4 Q I see.

5 A The letters were about the organization.

6 Q I get it.

7 A They would have to be viewed. I would have to
8 see it to give you more information about it.

9 Q So some of the content of these letters had to
10 do with the organizational matters, and others had to do with
11 personal matters?

12 A Right.

13 Q Then after leaving the church, did you go to
14 Mr. Garrison and obtain these binders that you had earlier
15 delivered to him?

16 A He gave me the binders for copying.

17 Q I see.

18 A I did it as a service to him. I paid for the
19 copying.

20 Q Did you make one or more copies?

21 A One.

22 Q And then did you return the binders to
23 Mr. Garrison and retain the copies or vice versa?

24 A Your first statement is correct. I gave him
25 back the binders with the first-generation copies and retained
26 the second-generation copies.

27 Q And then did you send those, that second-
28 generation set of copies, to Mr. Flynn?

1 A. Sometime later.

2 Q. Approximately how much later?

3 A. Some months.

4 Q. So you retained that set of copies in your
5 possession for some period of time?

6 A. Yes.

7 Q. Did you show those to anybody during that
8 period of time?

9 A. I don't believe so.

10 Q. Did you permit anybody else to make copies of
11 them?

12 A. No.

13 Q. You stored them at your residence, then, for a
14 period of time prior to sending them to Mr. Flynn?

15 A. Right.

16 Q. All right. Do you recall a folder or document
17 or something entitled "Journal 32"?

18 A. No.

19 Q. Does that sound familiar?

20 A. No.

21 Q. Are you familiar with a document that would be
22 Mr. Hubbard's wartime journal?

23 A. Yeah.

24 Q. Do you recall that being one of the documents
25 that you had in your possession as the archivist?

26 A. I believe so.

27 Q. Can you describe to me what form this document
28 took.

1 A. It was a -- began in I believe in 1943, and it
2 carried on for a few months, and it was Hubbard's writing
3 about his life, about -- yeah, it was mainly about his ideas,
4 his thoughts, his life, incidents in his life, his attitude
5 toward the military, toward various things.

6 Q. Was it in the form of a notebook of some kind
7 or were they loose papers, or how was it compiled when it
8 came into your possession?

9 A. It was loose papers.

10 Q. Were these originals or copies?

11 A. Originals.

12 Q. And approximately how many pages?

13 A. A hundred.

14 Q. Then did you follow the same procedure you've
15 outlined with these other materials: make a copy and provide
16 the copy to Mr. Garrison?

17 A. I believe it was the same.

18 Q. So as far as you recall, you transferred a
19 copy of these materials that were characterized as
20 Mr. Hubbard's wartime journal to Mr. Garrison --

21 A. Yes.

22 Q. -- for purposes of the biography project?

23 A. Yeah.

24 Q. And do you recall when you made that transfer?

25 A. Late '80 or beginning of '81.

26 Q. And did you later go to Mr. Garrison and obtain
27 that copy from him again?

28 A. Mr. Garrison gave me the binders to copy the

1 contents of.

2 Q So you compiled this into a binder for him?

3 A Yes.

4 Q One binder?

5 A That's correct.

6 Q And would that have been May of '82

7 Mr. Garrison gave you the binder to copy?

8 A I can't state that it was that month, but
9 there is some point in the spring that he gave me the binder
10 to copy.

11 Q And did you make a copy of that?

12 A Yes.

13 Q One or more than one?

14 A I believe only one.

15 Q And did you then return the binder to

16 Mr. Garrison and retain the copy you made?

17 A Yes.

18 Q Then did you retain that in your possession
19 for some time?

20 A Yes.

21 Q And then send it to Mr. Flynn?

22 A I -- I don't know if it was amongst that stuff
23 or not. I can't say for sure.

24 If -- by the way, if this is -- we're getting
25 into -- the situation is developing where we're going to have
26 another Kenneth Long kind of a declaration come down which
27 alleges that it's in this box or that box, or that what was
28 sent to him because of my testimony didn't come back, or what

1 I sent to him didn't come back, then I think that we ought to
2 not get into it. Because if I'm being led to believe that
3 something that I may have sent to Mr. Flynn didn't come back
4 simply because you're going down a list of documents which
5 I handled in March of 1982, then, if that's the intention,
6 then I think we ought to end it and go to the court and look
7 through the documents because the -- Mr. Long's declaration
8 was inaccurate in the extreme.

9 MR. MAGNUSON: I move to strike this response as
10 unresponsive.

11 THE WITNESS: And it paints a picture -- I want to
12 know are all of what you are asking there, are those the
13 documents which are under seal?

14 BY MR. MAGNUSON:

15 Q. I would suggest you just listen to the
16 question and answer it. If it's something that's within your
17 personal knowledge, if you have to estimate, that's all you
18 have to do is just answer the question as accurately,
19 truthfully as possible.

20 So it's your testimony that you are not sure
21 whether you sent these binders to Mr. Flynn or not?

22 A. I don't believe that there was a binder.

23 Q. Or the copies?

24 A. There may have been.

25 Q. There may have been a binder?

26 A. There may have been copies. There may have
27 been a binder, too, but I don't recall a binder, and I'm
28 pretty fuzzy about whether or not those documents even went.

1 I sent all the copies that I had -- I had retained them for
2 some time from Mr. Garrison. I shipped them all off. I did
3 not go through them prior to sending them off. I sent them
4 off.

5 Q. Yes, I understand that.

6 If you did not send them to Mr. Flynn, is it
7 your testimony, therefore, that you sent them to Contos &
8 Bunch? Would that be accurate that you sent them either to
9 Mr. Flynn or Contos & Bunch?

10 A. That I sent what?

11 Q. Copies of that wartime journal.

12 A. No.

13 Q. You don't recall?

14 A. No. I -- Omar had some copies, copies of
15 copies, and he had them stored down with Bill Crago. So
16 some copies of copies were down there. What those were, I
17 don't know.

18 I really think that -- I have not viewed the
19 documents under seal, and I think that may be appropriate.

20 Q. You may be right.

21 MS. DRAGOJEVIC: Well, I have an objection. Because
22 last time we were here Mr. Litt advised that the deposition
23 would most likely take place at the courthouse, and he had
24 ample opportunity to arrange such a deposition at the
25 courthouse and didn't. And I'm going to object to any
26 continued session of this deposition to a different day. So
27 as far as I am concerned, you are going to get your
28 information today, and there is not going to be another

1 opportunity unless the court orders it.

2 MR. MAGNUSON: Well, let's see how it goes today.

3 Q All right. Now, the next document I want to
4 discuss, or set of documents, have to do with the death of
5 Quentin Hubbard. Do you recall some materials coming into
6 your possession as the archivist on the subject?

7 A Yeah.

8 Q Do you recall where you obtained those materials?

9 A They were given to me by the B-1, the
10 intelligence bureau of the Guardians Office. They were actually
11 delivered to -- Vaughn Young brought them in.

12 Q Provided them to you while you were holding the
13 archives position? It's not a trick question.

14 A Well, in a sense -- in a sense, yes; in a sense,
15 not. They were -- Vaughn Young was the organizational liaison.
16 He was the -- he was to be working on the biography project as
17 the organizational personnel. He had access to the Guardian
18 office files. He brought them in. They were copied on the
19 same machine that we all used and then delivered to
20 Mr. Garrison.

21 So that should answer your question.

22 Q That's fine. Did you make one copy of these
23 materials or two or more?

24 A What point in --

25 Q While you were in the archives post.

26 A I believe that two copies were made. I can't
27 say for certain. I really can't say. Some, two were made;
28 others were only made one depending on what the documents were

1 and time.

2 Q Then, as you recall, was the original set that
3 was given to you stored there? You made a copy to also be
4 retained in the archives area and a copy that you transferred
5 to Mr. Garrison; is that right?

6 MS. DRAGOJEVIC: As far as you can recall.

7 THE WITNESS: I seem to recall the original of those
8 documents or maybe there were even a copy then going back to
9 B-1.

10 BY MR. MAGNUSON:

11 Q And did these documents in fact concern the
12 death of Quentin Hubbard?

13 A Yes.

14 Q Did you read these materials?

15 A Yes.

16 Q Do you recall when you transferred these to
17 Mr. Garrison?

18 A Sometime in late 1981, probably in December,
19 the first part of December.

20 Q Shortly before you left your position?

21 A Yeah.

22 Q Did you then sometime later after leaving the
23 church obtain a copy of those materials from Mr. Garrison or --
24 I'm sorry -- obtain those materials that you had previously
25 delivered to Mr. Garrison?

26 A I believe so.

27 Q And then did you make another copy of those
28 materials at that point?

1 A. It -- I believe so.

2 Q. Did you then return to Mr. Garrison the copy you
3 had obtained from him and retain in your own possession the
4 second copy?

5 A. I think so.

6 Q. Did you thereafter send that copy that you had
7 retained to Mr. Flynn?

8 A. I believe so.

9 Q. Did you show any other individuals these
10 documents or copies of these documents?

11 A. I don't recall.

12 Q. Is it possible that you did, while they were in
13 your possession after obtaining them from Mr. Garrison, show
14 them to other individuals?

15 A. It seems extremely unlikely.

16 Q. All right. Now, let's proceed to letters from
17 Mr. Hubbard -- or exchange of correspondence between
18 Mr. Hubbard and Helen O'Brien, and maybe we can also include
19 letters between Mr. Hubbard and John Nogabower. Do you
20 recall these --

21 A. Yes.

22 Q. -- letters?

23 Do you recall both the Helen O'Brien letters
24 and the John Nogabower letters?

25 A. No. Well, I don't recall any Nogabower, but it
26 could be.

27 Q. You do recall the O'Brien letters?

28 A. She was married to Nogabower so it was possible.

1 Q Where did you obtain these documents while you
2 were on the archivist post?

3 A They came from Hubbard's archives in Del Sol.
4 They came from Pers Sec archives, and they came from
5 Controller archives, and they came from Helen O'Brien.

6 Q When you had compiled these letters from these
7 various sources, approximately how many letters were involved?

8 A Maybe 50, 60.

9 Q And were these in fact letters from L. Ron
10 Hubbard to O'Brien and possibly from Nogabower and from
11 O'Brien to Mr. Hubbard? In other words, correspondence went
12 both ways?

13 A I believe so.

14 Q Were these original letters that you took into
15 your possession at that point?

16 A Some may have been copies. The bulk as I recall
17 were originals.

18 Q And then did you make copies of those letters
19 similarly to the other materials that we've discussed?

20 A Yes.

21 Q Do you recall how many copies you made?

22 A I believe two.

23 Q And do you recall where the copies and the
24 originals then went?

25 A Yes.

26 Q Where is that?

27 A One to Garrison and one on a shelf of duplicate
28 materials that I had.

1 Q And where did the second copy go?

2 A One to Garrison and one onto the shelf.

3 Q Then the originals, where did they go?

4 A In the files.

5 Q Do you recall when you took these letters to
6 Mr. Garrison?

7 A It would be throughout 1981.

8 Q Did you then after leaving the church obtain
9 from Mr. Garrison the copies you had delivered to him?

10 A Yes.

11 Q Were these in a binder form similar to the
12 others?

13 A Yes.

14 Q How many binders if you recall?

15 A I believe two.

16 Q Then did you copy these two binders that you
17 obtained from Mr. Garrison?

18 A Yes.

19 Q And did you return the bound set to
20 Mr. Garrison and keep in your possession the copies?

21 A Yes.

22 Q And did you later send those materials to
23 Mr. Flynn?

24 A To the best of my recollection, yes.

25 Q Do you recall whether you showed these copies
26 to any other individual?

27 A Maybe Jocelyn.

28 Q You read the letters yourself?

1 A. Yes.

2 Q. Anybody other than Jocelyn that you can recall
3 having shown these letters to?

4 A. I don't recall. I don't believe so.

5 Q. Can you estimate how long you had them before
6 you sent them to Mr. Flynn? That is, between the time you
7 copied the set from Mr. Garrison and sent that set to
8 Mr. Flynn?

9 A. Just a few days.

10 Q. When did that take place approximately?

11 A. I don't know. Maybe July.

12 MR. MAGNUSON: Could we take a short break so I can
13 make this phone call?

14 MS. DRAGOJEVIC: Sure.

15 (Brief recess.)

16 MR. MAGNUSON: Okay. We can go back on the record.
17 Are you ready?

18 MS. DRAGOJEVIC: Gerry, are you ready?

19 THE WITNESS: Yeah. Go ahead.

20 BY MR. MAGNUSON:

21 Q. Mr. Armstrong, do you recall correspondence
22 between Mr. Hubbard and his attorneys as being documents that
23 you obtained while you were in the archives post?

24 A. I can't answer that.

25 Q. Well, it's true, isn't it, that among the
26 documents there were various materials dealing with legal
27 matters and some correspondence between Mr. Hubbard and his
28 attorneys from different points in time?

1 A. I can't answer that. You have to tell me which
2 attorneys were Mr. Hubbard's attorneys and when and what
3 documents, and perhaps we can get down to it.

4 Q. Do you recall letters and dispatches from
5 Mr. Hubbard to Mary Sue Hubbard and similar letters to his
6 attorneys, including Leonard Boudin, from the 1977-78 period?

7 A. Let me get this straight. You are asking about
8 a group or classification of letters, some of them between
9 Mary Sue Hubbard and Mr. Hubbard and some of them to
10 Mr. Hubbard's attorney Boudin --

11 Q. That's right.

12 A. -- from Mr. Hubbard?

13 Q. Or vice versa, or from Mr. Boudin to
14 Mr. Hubbard.

15 A. Yes.

16 Q. If you recall, where did this correspondence
17 come from? Where did you obtain it while you were on the
18 archives post?

19 A. I'm trying to think. I recall it being in a
20 box, and I think the box came from Pers Sec files.

21 Q. Okay.

22 A. But I'm not sure. But there was a box of
23 materials which had been apparently buried at one point during
24 the raid scare at the beginning of 1980. There was -- some
25 material was taken out and buried, and there was a box of
26 this material which I had secured somewhere in archives, and
27 it could have come from there; it possibly did.

28 Q. Let me ask you this: What do you recall as far

1 as the nature of such materials? Were there letters? I've
2 sort of lumped all these things together. Can you explain
3 what you recall the form of these documents being?

4 A. Letters and dictation.

5 Q. From Mr. Hubbard to his attorney, Mr. Boudin?

6 A. No. There's various classifications in which
7 I'm --

8 Q. Tell me --

9 A. -- in my recollection here. Letters between
10 Mr. Hubbard and Mrs. Hubbard, letters transcribed -- when I
11 say "transcribed," I mean taken down in longhand by one of the
12 messengers or two of the messengers. Pat Broeker is
13 definitely one of the writers of these things.

14 Mr. Hubbard, so I can explain, often used to
15 verbally dictate his letters, or he would dictate notes, and
16 those would be written down by the messengers or recorded by
17 the messengers.

18 The ones that I'm thinking of were taken down
19 longhand, later typed up into some other format. So we had --

20 Also there was a project in there amongst
21 these things, a project for organization personnel on the
22 handling of this attorney, on how to bring him to the property,
23 or they were going to have a secret meeting because Hubbard was
24 at that point in fear because of the federal case.

25 Q. So these materials that you are talking about
26 were documents that contained that kind of information?

27 A. That's correct.

28 Q. And when you obtained these materials in your

1 archives post, did you then copy them similarly to the other
2 materials that you have already discussed?

3 A. That's correct.

4 Q. Explain what you did with them.

5 A. I either made one or two copies and gave a copy
6 to Mr. Garrison.

7 Q. Left the originals that you had there in the
8 archives and left a set of copies in the archives?

9 A. I -- I don't know if I made -- see, I didn't
10 make two copies of everything. It sort of depended on what
11 the materials were.

12 So if again I can't recall, okay, and I am --
13 I cannot attest with certainty like that this is here
14 (indicating). So that has to be taken into consideration in
15 this testimony I'm giving you. I'm giving you my best possible
16 recollection, but I don't want someone to come leaping forward,
17 "Because he said this, so therefore one is missing."

18 I don't have any documents. Everything I had
19 I sent to Flynn, Contos & Bunch, or Omar Garrison, and that's
20 it.

21 Q. Okay. All I'm asking is for your recollection.
22 I don't expect anything more than that.

23 Were these materials that you obtained
24 originals? That is, were they in the original handwriting,
25 or were they, in turn, copies?

26 A. I believe some were carbon copies and some were
27 originals and some were Xerox copies.

28 Q. Did they include --

1 A. I'm not totally sure on it, but I do know that
2 some of them were definitely carbon copies, so the original
3 carbons --

4 Q. Do you recall whether these letters had
5 Mr. Hubbard's signature on them?

6 A. I don't recall.

7 Q. And as you recall, they included both hand-
8 written notes that Mr. Hubbard had dictated to someone, and
9 they also included a finished letter that those notes had
10 been transformed into?

11 A. I don't recall if there were one or both. In
12 some of them there may have been both; in some of them there
13 may have been one. Does that --

14 Q. I understand. Do you recall when approximately
15 you delivered these materials to Mr. Garrison?

16 A. Maybe fall of '81.

17 Q. And did you go through these and read the
18 documents?

19 A. I believe so. Maybe not all of them but
20 definitely some.

21 Q. And did you then after you left the church
22 sometime later go back and go through the same process by which
23 you obtained from Mr. Garrison, or Mr. Garrison gave to you,
24 the documents that you had earlier delivered to him?

25 A. I believe so. Again, so we're very clear on
26 this, there may have been amongst what I sent to Flynn some
27 first-generation copies because there came a point at which I
28 shipped off everything I had. Even Contos & Bunch may have

1 some first-generation copies. I just got rid of everything.
2 So they may have shown up with some binders; I don't recall.
3 In the main, the copies were second-generation copies which
4 Mr. Garrison had me make, and I forwarded them. So --

5 A. Just so I'm clear, is this essentially the
6 situation: that you obtained from Mr. Garrison a number of
7 documents, some of which you copied and returned to him. You
8 didn't necessarily get through all those materials to copy
9 them, and at a certain point sent what you had to either
10 Mr. Flynn or Contos & Bunch?

11 A. Right. Now, if there's any first-generation
12 copies, then that's the category that they fall into.

13 Q. That would be documents that you had not gotten
14 to copy yet or had not yet copied --

15 A. Right.

16 Q. -- and sent them off? I understand.

17 MS. DRAGOJEVIC: Could we go off the record for a
18 minute.

19 (Off the record.)

20 MR. MAGNUSON: Back on the record.

21 Q. So is it your recollection that you sent either
22 copies of these materials or the materials themselves to
23 Mr. Flynn, or do you not recall?

24 A. I believe to the best of my recollection I sent
25 those.

26 Q. Now, let's discuss the letters and dispatches
27 relating to Alexis Hollister. Do you recall those materials?

28 A. Yes.

1 Q Where did you obtain these while you were on
2 the archives post?

3 A I believe from the Pers Sec files.

4 Q Do you recall when these materials came into
5 your possession?

6 A Early 1980.

7 Q Shortly after you assumed the archives post?

8 A Yes.

9 Q Do you know what the character of those
10 documents is? Is that letters or notes, or what is the form
11 these materials take?

12 A There's a number of letters, and then there are
13 some organizational memos or orders.

14 Q And these are between whom, if you recall? Who
15 are the memos, letters, and orders exchanged between?

16 A Alexis Hollister and Harry Hubbard, Alexis
17 Hollister and L. Ron Hubbard, L. Ron Hubbard and Jane Kember,
18 Jane Kember and L. Ron Hubbard, Mary Sue Hubbard and L. Ron
19 Hubbard. That's who I recall.

20 Q About how many documents are we talking about?

21 A Maybe 40 or 50 pages.

22 Q Did you then compile these into a binder form?

23 A Yes.

24 Q Do you recall how many copies you made of these
25 materials?

26 A At what point?

27 Q While you were on the archives post.

28 A To the best of my recollection, two.

1 Q And as you recall, did you go through the same
2 process of keeping the original set in the files; if you made
3 a second set, storing those in the archives; and transferring
4 a copy to Mr. Garrison?

5 A Yes.

6 Q Did you read these materials?

7 A Yes.

8 Q Do you recall when you transferred these
9 materials to Mr. Garrison?

10 A Sometime in 1981.

11 Q Do you recall early or late '81?

12 A No. I would say early to mid.

13 Q Did you then after leaving the church obtain
14 this set that you had previously delivered to Mr. Garrison?

15 A I believe so.

16 Q Do you remember when that took place?

17 A Early spring of '82 or spring of '82.

18 Q Do you recall whether you made copies of those
19 materials that you obtained from Mr. Garrison at that point?

20 A I believe so.

21 Q Do you recall how many copies you made?

22 A To the best of my recollection, one.

23 Q What did you do with the set you had obtained
24 from Mr. Garrison?

25 A I believe I gave him the first-generation copies
26 in a binder back and retained the second-generation copy.

27 Q Do you recall if you subsequently sent those
28 documents to Mr. Flynn as well?

1 A. To the best of my recollection, yes.

2 Q. Did you show those documents to any other
3 individual while they were in your possession during that time
4 after you had obtained them from Mr. Garrison?

5 A. I don't -- I don't believe so, but -- I don't
6 think so.

7 Q. Do you recall when you sent these materials to
8 Mr. Flynn?

9 A. Around the time as all the other ones.

10 Q. Between June and August --

11 A. Yes.

12 Q. -- 1982?

13 Do you recall while you were on the archives
14 post obtaining letters between Mr. Hubbard and his son, Ron
15 DeWolf, which were from the late 1970s and the '80s?

16 A. Yes.

17 Q. Do you recall where you obtained those letters?

18 A. To clarify just so -- that earlier "Yes." I'm
19 not stating that necessarily the letters which are between L.
20 Ron Hubbard, Jr., that is, Ron DeWolf, and his father were
21 indeed those things because the fact is, as we know, they weren't
22 from his father the ones which were -- which -- the phony
23 letters, that's what I mean.

24 Q. It is your testimony --

25 A. So when we're talking about the letters between
26 L. Ron Hubbard, Jr., and his father, I'm including in those
27 also L. Ron Hubbard, Jr., and people acting as if they are his
28 father, pretending to be his father in the letters. So that's

1 the majority of the letters you refer to between 1970 or 1980,
2 whatever it was of that kind. So just so it's proper --

3 Q Then to clarify, setting those aside, the ones
4 as far as you know you believe to have not been written by
5 Mr. Hubbard, were there also letters between L. Ron Hubbard,
6 Sr. and Jr. that as far as you know were written by
7 Mr. Hubbard, were there also such documents in your possession
8 at that time?

9 A Yes.

10 Q Now, can you explain to me where you obtained
11 each of those sets of letters.

12 A The letters between L. Ron Hubbard and L. Ron
13 Hubbard, Jr. begin in approximately 19-- maybe 1940, something
14 like that. They run through maybe 1980 or '81. That's
15 including all classifications. They were obtained from the
16 storage facility at Del Sol on Gilman Hot Springs property,
17 from the Pers Sec archives, from the Controller archives, and
18 from the Guardians Office -- that's organizational archives.

19 Q Did you then compile all these and put them into
20 binders?

21 A I -- get it straight. I took the originals,
22 copied them, and put the copies in the binders. The originals
23 were maintained in files.

24 Q How many volumes of binders did this entail,
25 do you know?

26 A Maybe two or three.

27 Q And did you transfer one set of these binders,
28 the set of copies to Mr. Garrison?

1 A. Yes.

2 Q. Do you recall when that took place?

3 A. Throughout 1981. When I say "throughout," often
4 I would provide him with a binder of materials, and then as
5 more material was located in different places, I would copy it,
6 put it into chronological order in the original file, and then
7 either give him the copy for entry into his duplicate file so
8 he had a chronology or myself put them in.

9 Q. I see.

10 A. So that I may have given him the binder at one
11 point, but the material occurred at various places at times
12 throughout that period.

13 Q. Was that true generally of the materials? If
14 you came upon some documents later that fit into a binder that
15 you had previously delivered to Mr. Garrison, you would go
16 through that same process you've described?

17 A. That's correct.

18 Q. Did you read these letters?

19 A. Yes.

20 Q. Then did you subsequent to leaving the church
21 obtain these materials also from Mr. Garrison?

22 A. At least some of them.

23 Q. Do you recall which ones you definitely
24 obtained? Can you make a distinction between which you
25 obtained and which you may not have?

26 A. I recall at least the later letters. The early
27 ones throughout the '40s and '50s and '60s may be there as well,
28 but I recall the later ones.

1 Q Then did you go through a similar process of
2 making copies of these documents?

3 A Yes.

4 Q Did you return the copies that you had obtained
5 from Mr. Garrison to Mr. Garrison?

6 A To the best of my recollection, yes.

7 Q And as you recall, kept that second-generation
8 copy in your own possession?

9 A I believe so.

10 Q And then did you at some later point send these
11 materials to Mr. Flynn; do you recall?

12 A Yes.

13 Q You do recall sending these materials?

14 A To the best of my recollection, yes.

15 Q Do you remember when you sent these to Mr. Flynn?

16 A Along with all the others.

17 Q Do you remember showing any of these materials
18 to anybody else during that period of time?

19 A I recall showing one page, I think -- to the
20 best of my recollection, it was only one page -- to Ron DeWolf.

21 Q This was at the Clearwater hearings?

22 A Yes.

23 Q Other than that instance, do you recall showing
24 any of these documents to anybody?

25 A I don't recall.

26 Q That specific document that you showed to
27 Mr. DeWolf at the Clearwater hearings, do you remember where
28 you obtained that originally?

1 A. I believe files called Pers Sec files.

2 Q. Let me ask you now: I think you've testified
3 earlier that there was a box or several boxes of original
4 materials that you obtained from the Controller's archives; that
5 then was taken to Mr. Garrison and which Mr. Garrison asked
6 you to go through and sort out. Is that essentially an
7 accurate summary of some of your testimony?

8 A. It's a partial -- there were original materials
9 which came from what's called Pers Sec Worldwide. Hubbard
10 maintained personal records at Worldwide. These were non-
11 technical. There's a differentiation made, and some of the
12 materials came from this library in archives, his archives over
13 there.

14 Q. So these materials included documents from that
15 source and documents from the Controller's archives?

16 A. And perhaps some of the Pers Sec archives as
17 well.

18 Q. And these were --

19 A. See, here's what happened. I don't know if
20 anyone has got the picture.

21 But following the F.B.I. raid in 1977, there was
22 a destruction of documents. There was also a sequestering of
23 documents off the various organization properties. Like in
24 Clearwater all of what were called the Pers Comm files were
25 taken off the organization property, or at least the office
26 property, and they were housed in a closet on one of the -- in
27 one of the -- it was like a sort of dorm, an apartment
28 building; it was a motel which the organization bought. And

1 they took the Pers Comm files off and sequestered them there.
2 There was also Pers Sec files which were kept partially in
3 that area.

4 During 1980 and '81, I set about to bring all
5 of these things which contained copies and originals but which
6 were considered by the organization to be Hubbard's personal
7 property, and I brought them all together. There was at that
8 point no differentiation made other than technical, what was
9 called technical materials, original policies and that sort of
10 thing.

11 Anything like that which I obtained -- and I
12 did get a lot of it in the Pers Comm materials and the Pers
13 Sec materials -- I delivered to Tom Vorm. That was the
14 arrangement which we had relative to these materials.

15 I had everything of a biographical nature,
16 which was Hubbard's personal archives. I had everything which
17 was nontechnical. He had the technical. By "technical" I
18 mean Hubbard's writings to do with auditing or training or
19 policies.

20 So when I'm talking about all these files, okay,
21 they took off from different places throughout that period of
22 1980 and '81, but they ended up in one place, in my office
23 which I maintained which was Hubbard's personal archives made
24 up of these different categories of documents. And I call
25 them "categories" simply because they were maintained or
26 accumulated by these various people, Pers Comm, LRH Personal
27 Communicator, who at one point kept all of Hubbard's writings,
28 either carbon copies of handwritten stuff or the originals or

1 typed stuff, but he was Hubbard's personal secretary, a
2 different category of materials, but in that they were like
3 letters between Hubbard and various people, as an example,
4 which Pers Comm may not keep.

5 Anyway, all these things were brought together
6 so you understand what -- when I say Pers Comm files, you know
7 that they came from the closet in Clearwater. I had them all
8 shipped out.

9 Q And then you in turn transferred these to
10 Mr. Garrison shortly before you left the church in December of
11 1981?

12 A In part. I went through these various boxes of
13 materials, and there was -- I mean it would practically fill
14 this room of materials. I went through that and found chunks
15 of materials which could have had biographical interest or
16 background interest, and Mr. Garrison saw this mass of junk.
17 It would have been ludicrous to copy it all, but he wanted to
18 be able to see it and decide on the copying of it.

19 So all of this material, the stuff from Tom
20 Vorm, the Controller archives -- the arrangement was it was no
21 longer to be in Controller archives because it was nontechnical
22 materials. It was transferred to this -- the Hubbard personal
23 archives. It was not archives writings about Dianetics and
24 Scientology. It was just Hubbard's personal archives.

25 Q I understand. Go ahead.

26 A So some of the material came from Tom Vorm,
27 some of the material came from Pers Sec, some of the material
28 came from the Del Sol boxes, the ones Hubbard thought had been

1 stolen in 1953, some came from there, and I went through it on
2 a rough basis with Mr. Garrison and said, "You know, here's
3 basically what it is." "Yeah, I'll take a look at that, and
4 yeah, that would be of interest."

5 And if I saw stuff of interest, I stuck it in a
6 box for him to go through.

7 So it didn't all come from Tom Vorm. It came
8 from these other sources as well, but it all came from my
9 offices. It all left from there to Mr. Garrison.

10 Q Right. When you speak of L. Ron Hubbard's
11 personal archives, it was your responsibility to preserve,
12 protect, and maintain these materials?

13 A Yeah.

14 (Off-the-record discussion.)

15 (Luncheon recess.)

16
17 EXAMINATION (RESUMED)

18 BY MR. MAGNUSON:

19 Q We're back on the record.

20 Mr. Armstrong, I'm going to now ask you a little
21 bit about documents that came from the Controller's archives,
22 and if you could tell me if you recall whether the particular
23 thing I mention was received by you from the Controller's
24 archives.

25 Specifically a file or document entitled
26 "British Immigration." Do you remember whether that was
27 something you obtained from the Controller's archives?

28 A I recall something about that.

1 Q And do you recall whether that document or those
2 documents, whatever you recall, was obtained from the
3 Controller's archives or from some other source?

4 A I believe from Controller archives.

5 Q Do you know what this dealt with?

6 A Yeah. It dealt with L. Ron Hubbard's
7 difficulties with the Immigration Department, the turn-down
8 of his visitor's visa. It dealt with information accumulated
9 or letters from the -- whatever it is called -- the Home Office,
10 is it? -- that sort of material.

11 Q And it's my understanding -- correct me if I'm
12 wrong -- that you didn't make copies of these materials, but
13 this was something that you took to Omar Garrison?

14 A It's very possible. There were materials like
15 that. The bulk of the original materials which I gave to
16 Mr. Garrison were from that period, were from the late '50s
17 into the '60s. There may have been some later, but that's the
18 period we're looking at.

19 Q And so do you recall whether that was a document
20 that Mr. Garrison later gave you to sort through among the
21 materials that you were supposed to sort through?

22 A It's very likely. I went through virtually
23 everything that he had. It's very possible.

24 Q But you don't recall specifically?

25 A No.

26 Q What about a document entitled, or perhaps a
27 folder entitled "Legal AMA-FDA 1968"? Does that sound
28 familiar?

1 A. I don't recall. I know that there were
2 materials on that subject; at least I recall seeing them in
3 the course of my stuff -- my work. These were not Guardians
4 Office archives. They were not organization archives material.
5 That came from Hubbard's own archives. There was information
6 on that. That's in addition to whatever there was in GO
7 archives.

8 I've seen hundreds of documents throughout my
9 course of time in connection with Scientology or Hubbard having
10 to do with FDA-AMA. I believe those were the --

11 Q. Do you recall whether you obtained these from
12 the Controller's archives?

13 A. Again to the best of my recollection, some of
14 them -- some of the materials which referred to that subject --
15 you must understand that that subject was referred to -- has
16 been referred to in thousands or even hundreds of thousands of
17 Scientology or Hubbardian documents.

18 Q. So as you recall, were documents regarding that
19 subject among those that you took toward the end of your stay
20 with the church to Mr. Garrison?

21 A. Very likely.

22 Q. And do you recall whether those documents were
23 among those sent to Mr. Flynn or to Contos & Bunch or someplace
24 else later?

25 A. The documents which were sent to Contos & Bunch
26 I don't think I even looked through, or if I did, it was real
27 brief. They were just an assortment which I had in the house
28 and which I -- I just cleaned the house out, and that was it.

1 That's the last time. Other ones may have been in the stuff
2 that Flynn got. There might be documents like that.

3 Q But you don't specifically recall whether those
4 documents were sent to Michael Flynn or sent someplace else or
5 whatever?

6 A No. I really would have to go through the court
7 documents. And I know that if I saw the document, I could
8 identify it; but just talking in those broad terms, no.

9 Q I see. What about a letter to Admiral Lever --
10 L-e-v-e-r. Does that --

11 A No.

12 Q Do you have any recollection of that document?

13 A No.

14 Q Do you recall a letter to Harold Wilson?

15 A I thought so, and I thought I remembered that in
16 connection with, perhaps, the immigration thing. Again I say
17 this was in the '60s, and the bulk, if not all, of those
18 original documents came from that period.

19 Q So the bulk of the original documents you
20 obtained from the Controller's archives came from that period?
21 Is that what you are saying?

22 A Right. The bulk of the original materials which
23 were given to Omar Garrison came from that period.

24 Q And the source of those original materials was
25 the Controller's archives plus some other sources?

26 A Controller archives, the St. Hill Manor,
27 Hubbard archives, the Pers Comm archives, and the Pers Sec
28 archives.

1 Q Just so I'm clear I remember from your earlier
2 testimony that the time period in which you obtained the
3 documents from Tom Vorm that were the Controller's archives --
4 maybe you could just quickly tell me what time period you
5 obtained these other original documents from the other sources
6 you have just described. Was that at the same time period or
7 at an earlier time period?

8 A The first documents of that type obtained were
9 the documents obtained from the Hubbard personal office at
10 St. Hill Manor, and that would have been in perhaps September
11 of 1980. I obtained them at the same time that I went over
12 and met with Omar Garrison. So you can date it from that.

13 The second bunch, the Tom Vorm documents, I
14 obtained documents from Tom Vorm throughout probably beginning
15 in 1980 there was some, the latter part of 1980 or early 1981,
16 and then throughout 1980 up until probably, I don't know, maybe
17 a week, two weeks before I left.

18 There was a number of other times when I
19 obtained documents from Tom Vorm. Either he delivered them to
20 me, or I went over to his office and went through the Hubbard
21 materials and took out the nontechnical materials. That
22 occurred throughout 1980 or 1981 right up until, I don't know,
23 maybe a short time before I left.

24 The other ones, the Pers Comm and Pers Sec
25 documents arrived box by box for a period throughout 1981.
26 When I say "box by box," they were sent to Los Angeles. It
27 was deemed at that point that Los Angeles was going to be the
28 collection point for all this stuff. I made the arrangements.

1 So as they could send it out with couriers who
2 went back and forth, they sent out a book at a time. The
3 person who sent this out was Pers Comm John McGinley or whoever
4 he designated.

5 Then at one point all the personal office staff
6 from Clearwater came out to Los Angeles, brought with them a
7 whole bunch of trucks, and in the trucks were the Pers Sec and
8 Pers Sec boxes which I then brought in from the truck or from
9 a house to the place where I had all the rest of the Hubbard
10 archives. And this took place probably in the summer and fall
11 of 1981.

12 Q. Fine. Let me refer again to a specific
13 document, letter to U.S. Governor, U.S. Consul, LP. Do you
14 recall that specific document?

15 A. No.

16 Q. Another document entitled "Copyright on
17 Royalties." Do you recall such a document?

18 A. I seem to recall documents about that subject
19 but not that specifically entitled document.

20 Q. Letter to Dr. U. Condon, does that sound
21 familiar?

22 A. No.

23 Q. Letter to General Madaris?

24 A. No.

25 Q. A document entitled "Legal WW Explorers Club"?
26 That's either a document or perhaps a folder, series of
27 documents.

28 A. It's possible. There was information on the

1 Explorers Club, and there was information on the broad theme
2 Legal WW, I believe so. There was material on legal tactics
3 from that period when Hubbard was at WW. I don't know if it
4 was even called WW then or called St. Hill, but I don't recall
5 a specific document. I'd have to see it.

6 Q Do you recall a document entitled "Policy on
7 Suits"?

8 A I believe so.

9 Q Do you remember whether that was obtained from
10 the Controller's archives?

11 A To the best of my recollection, yes.

12 Q And do you recall whether that was among the
13 materials you transferred to Mr. Garrison?

14 A Yes. Again --

15 Q As far as you recall?

16 A If -- let's look at it this way. If it's
17 amongst the documents that were in court, yes; then, yes, that's
18 how it got there.

19 Q But you don't specifically recall whether that
20 document went to Mr. Garrison or not?

21 A I would have to see the document. If I saw it,
22 I could answer that.

23 Q So do you recall whether that document was sent
24 to Mr. Flynn or not?

25 A Same answer. I would actually have to see the
26 document. I don't recall the title although I believe that
27 there was a document on that subject.

28 Q I see. Okay. Are you familiar with a document

1 entitled "Excalibur"? I believe it's a manuscript.

2 A. Yes.

3 Q. Was that a document that came into your
4 possession when you were on the archives post?

5 A. Yes.

6 Q. What was the source of that document?

7 A. Just to clarify the word "document" so that
8 we're not going down the wrong track here, there were three,
9 basically three different versions or three groups of materials
10 called Excalibur. One was a carbon of a manuscript. One was
11 a -- to my recollection it was basically a complete original of
12 a manuscript, and the other one was parts, assembled as well as
13 I could, of the manuscript.

14 So there are three different versions, all of
15 the documents of which were either -- there were some Xeroxes
16 amongst this random pile of papers. Some different type of
17 Xerox paper, photocopy paper.

18 So the documents were either original typed
19 manuscripts, Xerox, a little bit of Xerox or carbon copy.

20 Q. And where did you obtain each of these copies?

21 A. All of them came from the materials in the Del
22 Sol Hotel on Gilman Hot Springs.

23 Q. All right. And then in your capacity as
24 archivist, what did you do with these in terms of copying and
25 storing them or transferring them to Mr. Garrison?

26 A. I took the -- all of these things were
27 interspersed in a number of boxes. They were just thrown in
28 at some point in some boxes, and there would be sections which

1 appeared to be in a sequence; some places I could find numbered
2 pages; some places there were big chunks of them together; and
3 other places I found random pages.

4 Through a course of some months, I went through
5 all these documents and assembled as well as I could the
6 various manuscripts of the various books which were included
7 there. And I also compiled, again as well as I could, the
8 three Excalibur manuscripts. When this job was done, I copied
9 them.

10 And originally, to the best of my recollection,
11 I made two copies. And the reason I made two copies was because
12 I received a -- this would probably be in the summer of 1980 --
13 an order from Laurel Sullivan saying that Hubbard had called
14 for a copy of the manuscript Excalibur.

15 So I wrote him a letter -- a "dispatch" we called
16 it -- and I brought some boxes, little white boxes that hold a
17 ream of paper. Each one of these manuscripts was a little less
18 than a ream. So I took -- made two copies of these three sets.

19 Q Two copies of each?

20 A Two copies of each. So at that point I had an
21 original -- and you can use that term for either an original
22 or a carbon -- but in any case I had these things, an original
23 and two copies. One of those copies was sent off to Hubbard.
24 At this point I had one copy left.

25 Sometime later Omar expressed an interest in
26 using Excalibur in -- both as a research tool and to perhaps
27 quote from it because there was a lot of mystique attached as
28 far as Scientologists were concerned to the unpublished work

1 Excalibur.

2 So I copied -- made another set which I put into
3 binders for Garrison.

4 Q Now, did you make three sets, one of each of
5 the versions, or you made a set of the one that was the
6 original?

7 A To the best of my recollection, I gave Garrison
8 three, all three. That's -- again I'm not certain because one
9 was a pretty random bunch of papers in many respects. It had
10 like little two-inch-wide strips that somebody had cut out of
11 a manuscript, and it had these old photocopies of some of the
12 other portions from the other more complete ones.

13 I may have given Garrison just the two volumes,
14 maybe only gave him one. I'm not exactly sure what he
15 requested, but I know that he definitely got one or the other.
16 He may have gotten three; he may have gotten two; he may have
17 gotten one. Again, I could tell from the inventory of all of
18 his materials what was delivered to him.

19 Q Did you subsequently, then, obtain that
20 manuscript or copies of that manuscript from Mr. Garrison?

21 A Well, I definitely had them at one point because
22 I was going through the manuscript for him, and then I think
23 that was the last thing that he had -- that he had me actually --
24 actually do.

25 And I can't recall if I got it from Bill Crago
26 or not to do that, but I remember sending him back these
27 binders which contained one -- I believe one version because
28 there was only three binders, and it would have been that thick.

1 Q Indicating approximately two inches?

2 A Right, something like that. Three binders.
3 And I sent those to Garrison. But I don't -- and that's what
4 makes me think that he may not have had all the sets of
5 Excalibur I thought he did. I thought he had at least two,
6 the two more or less complete volumes. And when I say
7 "volumes," then the volumes would have been divided into
8 subvolumes, three of these binders.

9 Q Then, did you send the copy that you obtained
10 to Michael Flynn, do you recall?

11 A No. I don't -- I don't recall although it's
12 very possible because, again, that would have been amongst
13 the materials which Omar would have me -- have had me copy for
14 him, all of which I ultimately sent to Michael Flynn.

15 Q Do you recall whether you sent a copy of that
16 to Contos & Bunch as well?

17 A I don't know. I don't know if -- you know, if
18 one went to one and didn't go to the other. I don't --

19 Q Let me ask you this: Did you ever make any
20 underlinings or notes in the margins of these documents that
21 you obtained from Mr. Garrison?

22 MS. DRAGOJEVIC: Did you say "you obtained 'for' or
23 'from'?"

24 BY MR. MAGNUSON:

25 Q From Mr. Garrison.

26 A I don't believe so.

27 Q How about --

28 A Not to my recollection.

1 Q. What about the documents that you provided to
2 Mr. Garrison? Had you highlighted any portions of those
3 materials before transferring them to him?

4 A. It's -- yeah.

5 Q. Would that have been the binders of materials
6 that you sent to him?

7 A. Right. It wouldn't have been an original
8 document, but it was very often the case where I -- I would
9 photocopy something and underline the part which referred to
10 Hubbard. I mean that was my job so I did that a lot, but it
11 would have been, again, a copy.

12 Q. And as far as Excalibur is concerned, did you
13 obtain from Mr. Garrison the sets that you had provided him
14 earlier and then copied those in the same way that you've
15 described the other documents?

16 A. It's very possible. It's very, very possible.
17 And again I say that because Omar took the binders of the
18 materials which he considered the most important and gave them
19 to me for copying, and I know he intended to quote from
20 Excalibur, and I very much feel that he did give me those
21 binders for the purpose of copying.

22 MS. DRAGOJEVIC: Could we just take a short break for
23 one second.

24 MR. MAGNUSON: Sure.

25 (Off the record.)

26 BY MR. MAGNUSON:

27 Q. Let me ask you now about the Hubbard naval
28 records. Were these also among the documents that you obtained

1 in your capacity as archivist?

2 A. The ones that I obtained in my capacity of
3 archivist, I did that.

4 Q. Do you recall where you obtained these documents
5 while an archivist? What was the source of your --

6 A. Of the ones that I collected?

7 Q. That's right.

8 A. Okay. There was a number of sources. The
9 first was the Hubbard materials which were stored in Del Sol on
10 the Gilman Hot Springs property. The second was the documents
11 that came from the Hubbard library office in St. Hill. These
12 were very few. The bulk up to that point were from the
13 Hubbard materials in Del Sol. There were some naval records in
14 the Pers Sec boxes which I would have obtained sometime in
15 1981, and there was a big chunk of naval records which were
16 obtained by Vaughn Young and given to Omar, and those were in --
17 that was the fall or -- yeah, fall of 1981.

18 Q. Then did you go through the same procedure and
19 organize these into binders, make copies of them, and put the
20 copies into binders? What was your procedure as far as these
21 were concerned?

22 A. Yes and no. There were binders which were
23 made. There were some original binders made from the Del Sol
24 materials. They were about five or six. Then there were some--
25 as more material came in, then there was another set of binders
26 which were developed. As the amount of naval material
27 expanded, I made more binders. To the best of my recollection,
28 that was kept chronologically as was the first set of binders.

1 Then there was this bunch of material which it
2 was quite a stack, maybe about six inches, four to six inches
3 in height which was given by Vaughn Young, and those I don't
4 know if I ever looked through or not. I think they were given
5 to Omar, and they were all copies. They were given to Omar
6 to check over and see if there was anything amongst them that
7 was not in the other materials which I had already provided to
8 him.

9 The earlier materials which I had already
10 given him in the binders pretty well covered Hubbard's military
11 career. This other set were simply given to Omar to fill in
12 any gaps.

13 Q. Do you recall whether Mr. Hubbard's fitness
14 reports were among these documents?

15 A. I would have to see exactly what a fitness
16 report is. I recall that there were what I would call a fitness
17 report, but there may be different -- there may be different
18 types of fitness reports.

19 Q. But you do recall documents of that nature being
20 amongst these?

21 A. Yes. Let's get it straight. My recollection
22 is something -- a form filled out with perhaps written notes on
23 the form by a superior officer.

24 Q. I see. And do you recall whether you sent these
25 naval reports, including the fitness reports or these
26 documents that you have just described, to Mr. Flynn?

27 A. I believe I sent him naval records of some
28 description. Whether or not they contained fitness reports,

1 I cannot say with certainty.

2 Q Do you recall the Campbell letters as being
3 documents that you obtained while you were on the archives
4 post?

5 A Yes.

6 Q What was the source of these letters?

7 A The -- there were two main sources. The bulk of
8 what are called the Campbell letters were copies, and these
9 were obtained from an early Dianeticist by the name of Perry
10 Chapdelaine, and I had an arrangement with him to make copies of
11 a bunch of files which he obtained from a former -- from the
12 publisher who had at some point taken over possession or control
13 of John W. Campbell's files.

14 And they were his files from when he was editor
15 of Astounding Science Fiction in the '30s and '40s and '50s.

16 Q These letters were from whom and to whom?

17 A Well, let's run this -- the letters came from
18 Perry Chapdelaine to me -- from Perry Chapdelaine to me. I
19 copied them, made a copy for us, copied for Perry, and sent him
20 back a copy plus the original letter. The originals consisted
21 of both originals and carbons, maybe Xerox but I don't recall.
22 It was mainly thin onion-skin carbons is what I recall.

23 Now, those letters were between John W.
24 Campbell and any number of individuals in the thousands.

25 Q Approximately how many letters are we talking
26 about?

27 A 50,000. I don't know. I don't know. Ten,
28 fifty thousand.

1 Q Do they include letters to Mr. Hubbard or from
2 Mr. Hubbard?

3 A To my recollection they did include correspond-
4 ence between John W. Campbell and L. Ron Hubbard.

5 Q Did you have any agreement or understanding with
6 Mr. Chapdelaine regarding dissemination of these letters?

7 A Basically.

8 Q What was that understanding?

9 A That they were for the organization's use and
10 not to be -- to my understanding --

11 Q Not to be distributed --

12 A Right, basically.

13 Q -- publicly?

14 A Basically. I don't -- I would have to see it.
15 We talked about a lot of things.

16 Q But in general he did not provide these for you
17 for public distribution?

18 A That's basically it, yeah.

19 Q Was he aware that you were providing these to
20 Mr. Garrison for purposes of the biography?

21 A I believe so. We talked about the whole
22 biography project at some length.

23 Q When did all this take place approximately?

24 A Throughout 1980 and '81.

25 Q Did you pay him for any of these letters, or
26 was this a voluntary kind of thing?

27 A The arrangement was we were going to copy them
28 and return the originals to him and make a copy for him.

1 Q So other than that, there wasn't any financial
2 arrangement?

3 A No.

4 Q Then, did you provide these copies to
5 Mr. Garrison?

6 A Well, only some. And again I gave him a bulk
7 of materials to go through to see if there was any information
8 which, again, filled in the gaps or gave him some insight into
9 the relationship between Hubbard and Campbell and Hubbard and
10 others and the whole science fiction body from the '40s and
11 '50s.

12 Q So is it true, then, that you didn't provide all
13 of these letters to Mr. Garrison but only some of them or --

14 A That's correct.

15 Q So you sorted through these materials and made
16 a determination as to which might be useful to Mr. Garrison and
17 which would not?

18 A Again very broadly. When I say that, what I
19 mean is there were certain periods in which John W. Campbell
20 was involved in Dianetics, involved with Hubbard or involved
21 with associates of Hubbard's, involved in science fiction or
22 the publishing industry at the same time as Hubbard was.

23 So I took those broad categories and was able
24 to go through and provide Omar with a block of materials, some
25 of which I went through the individual files because they were
26 sort of in a date order according to the boxes and in the
27 order that Perry Chapdelaine sent them to me. So I went
28 through and chose either a whole file that might contain a

1 whole bunch of material, some of which had something to do with
2 Hubbard, not necessarily all of it.

3 So I never went through every file. Some of
4 them I just disregarded because Hubbard was not included.
5 But out of that mass, and this was practically a file cabinet-
6 ful of the stuff, I selected a box which Omar was to go through
7 and see what he wanted. A lot of it was for background
8 reading, not necessarily for use of any kind, but to get an
9 understanding, insight, background.

10 Q Then were these documents among those that you
11 obtained later from Mr. Garrison?

12 A I would -- I don't know. Here's what happened.
13 Out of this big bulk Omar chose some, some of the letters as
14 what he wanted to study or to, you know, go over in more
15 detail. I took those that he chose, assembled them in a logical
16 order, and made up, to my recollection, three binders.

17 Now, this was after I left the organization,
18 after I -- sometime later I compiled these things again.

19 Now, Omar considered the Campbell letters --
20 these were ones which he had chosen, and perhaps he considered
21 them of some importance so perhaps he gave them to me.

22 I don't recall in the whole scheme of things if
23 I copied them or if they went over to Flynn. I just don't
24 recall. They were not significant to me, but they may have
25 been amongst that mass of photocopies. If that's the case,
26 then that's how it came.

27 Q I see. Let's go off the record.

28 (Off the record.)

1 BY MR. MAGNUSON:

2 Q Now, let me ask you about this letter that was
3 produced at one of your earlier depositions, L. Ron Hubbard
4 to Mary Sue Hubbard, or vice versa, Mary Sue Hubbard to L. Ron
5 Hubbard. This was the letter that you testified as to having
6 carried around for some time. You know the one I'm referring
7 to?

8 A Right.

9 Q Where did you obtain that letter while you were
10 on the archives post? What was your source?

11 A I'm pretty sure that came out of the Del Sol
12 materials.

13 Q Which you obtained approximately what date?

14 A Beginning of 1980.

15 Q And then did you make copies of that document or
16 that letter, or what did you do with it while you were at the
17 archives?

18 A I believe that there was a copy made. I would
19 have to check with Omar to be sure, but I know that somewhere
20 along the line sometime later in '81, I'm pretty sure, I
21 delivered a copy to him or -- I don't know. I remember him
22 seeing -- this would be in mid-1981 because I didn't have that
23 letter the whole time. It showed up later as I went through
24 all these materials.

25 Q Did you show that letter to any other individuals
26 while you were on the archives post?

27 A I think I showed it to Barbara

28 Q Then what happened to the original of the

1 letter?

2 A. The original I believe I gave to Omar at some
3 point, perhaps when we were leaving, because I got it back from
4 him later.

5 Q. Do you recall when you got it back from him?

6 A. It would have been sometime in the spring. I
7 remember Laurel -- at some point I was in touch with Laurel
8 Sullivan, and she said she was in touch with Mary Sue, and
9 Laurel was going to send me an address for her, and then
10 Laurel at one point wasn't sure if that was the right address,
11 and then she confirmed that Mary Sue was still at that
12 address, and I sent the letter in -- sometime in the summer of
13 '82 to her.

14 Q. Did you ever make a copy of that letter after
15 leaving the church?

16 A. I -- I'm not sure. It's possible, but I'm
17 just -- I'm not sure. It's possible. I seem to remember some-
18 thing about it coming up maybe with -- maybe with Contos &
19 Bunch.

20 Q. Do you recall ever showing it to anybody after
21 you left the church?

22 A. I showed it to Flynn.

23 Q. Anybody else?

24 A. I don't know. Maybe Jocelyn. I don't recall
25 if there was anyone else or not. Maybe -- it could be Mike
26 and Kima. I remember talking to Kima about it and about Mary
27 Sue and something in relation to it, so it's possible.

28 Q. Mr. Armstrong, your attorney a few minutes ago

1 handed me a copy of a document entitled "Executive Directive"
2 dated 20th of August, 1983, and indicated that this was a
3 document that you had in your possession, and I've been
4 provided a copy. Is this in fact a document that you have
5 had in your possession?

6 A. Yes.

7 Q. Where did you obtain this?

8 A. I was sent it by a man by the name of David
9 Jordan.

10 Q. Approximately when did you receive this?

11 A. I'd say a month ago. Maybe a little less, maybe
12 three weeks, I don't know.

13 Q. Well, while on the archives post, do you recall
14 obtaining originals or copies of correspondence between Mary
15 Sue and L. Ron Hubbard?

16 A. Yes.

17 Q. What was the source or the sources of that
18 correspondence?

19 A. The Hubbard storage in Del Sol in Gilman Hot
20 Springs, the Hubbard Worldwide documents, the Pers Sec files,
21 the Pers Comm files, the Controller archives files. I don't
22 know. They were pretty strewn around throughout a lot of
23 sources, a lot of letters.

24 Q. Approximately how many letters would you say?

25 A. Maybe 300 back and forth.

26 Q. Over --

27 A. Maybe more. Two to four hundred, maybe.

28 Q. Okay. And over what period of time do these

1 letters cover?

2 A. 1952, I guess, through 1978, maybe, maybe '79.

3 Q. Did you read these letters?

4 A. Some of them.

5 Q. And what did you do with them when you obtained
6 them in your capacity as archivist?

7 A. I put them into some sort of logical order,
8 tried to assemble them into a sensible order because in a lot
9 of the boxes and that sort of thing they were strewn around,
10 a page here and a page there. So I had to piece them together,
11 and once they were together, then in various blocks, time
12 periods, I copied them and made a copy for retention and made a
13 copy for delivery to Omar Garrison.

14 Q. The ones that you obtained from these various
15 sources, were these original letters?

16 A. I think some would have been originals, some
17 would have been carbons, some would have been photocopies.

18 Q. And were they handwritten, typed, or --

19 A. Either.

20 Q. A mixture?

21 A. Yes. To the best of my recollection, I could
22 not give you a percentage, but I would say there is some
23 handwriting, and there is some typing.

24 Q. And did you subsequently obtain these letters
25 from Mr. Garrison?

26 A. Some of them. Probably some of them.

27 Q. Which if you recall? Which ones did you obtain?

28 A. There would have been some of the -- some of

1 the binders, maybe all of them, but again I can't say.

2 Q Well, was there some reason why you would
3 obtain certain of the letters and not others?

4 A No. The only reason I could think for that was
5 if they were in separate binders, and I had some of the binders,
6 and he had some of the binders at a given period. That would
7 be the -- what would make sense.

8 Q So you are talking about the period after you
9 had left the church. While you were continuing to work with
10 Mr. Garrison, you had certain of the binders in your
11 possession that contained these letters, and Mr. Garrison had
12 others?

13 A Well, as I say, it's possible, When I was
14 copying binders for him, I did not have all the binders at once.
15 He was working with them, and he would give me a portion to
16 copy. I would copy them. He would continue to work, and we
17 would have them cycling like that. That may be the case with
18 these Mary Sue documents. I don't know. I don't know. It
19 doesn't stand out as something that's significant.

20 Q Well, did you in fact, however, copy some of
21 those letters that were in binders during that period after
22 you left the church?

23 A I'm pretty sure.

24 Q And --

25 A Most of my recollection of that is a deductive
26 recollection on the basis of the statements that there are
27 Mary Sue letters under seal. Again, I was copying these
28 things for Omar in large part, and when I sent these photocopies

1 to Flynn, I mean I got rid of everything in a big hurry, and
2 that was about it.

3 Q And these were among the materials you sent to
4 Mr. Flynn?

5 A They would be amongst the photocopies.

6 Q Do you recall the marital agreement document
7 between Mr. and Mrs. Hubbard?

8 A Yep.

9 Q Do you remember the source of that document
10 while you were the archivist?

11 A It came from the Del Sol materials.

12 Q And did you similarly make copies of that
13 document or those documents?

14 A I'm relatively certain that I made copies,
15 probably provided them to Mr. Garrison.

16 Q Is this one or two documents? Can you explain
17 what form the marital agreements take.

18 A To my recollection, there are two documents.
19 One is signed by Mary Sue Hubbard; one is signed by L. Ron
20 Hubbard. And it's an agreement -- I can't say what the legal
21 name is, but just what I would call it's an agreement for an
22 uncontested divorce.

23 Q And this is from the early 1950s; correct?

24 A I don't know if it was ever dated.

25 Q And do you recall providing either the original
26 or copies of those documents to Mr. Garrison?

27 A I'm sure -- I'm sure. I don't -- you know, if
28 he didn't show up with them, then I'm saying the wrong thing.

1 I don't recall the instance of doing it, but I know we've
2 talked about the documents, so --

3 Q Do you know when you provided to Mr. Garrison
4 the original of these or what became of the original of these
5 documents?

6 A I think he had the original up to a point at
7 least. It could have been amongst the pile of junk, I'm
8 pretty sure.

9 Q As far as you recall, you did provide him the
10 original of these two documents?

11 A I believe so.

12 Q Would that have been toward the end of the
13 period that you were with the church that you transferred that
14 to Mr. Garrison?

15 A I would think so.

16 Q Do you recall obtaining when you were archivist
17 correspondence between Mr. Hubbard and Sara?

18 A Run that by me again.

19 Q When you were the archivist, did you obtain
20 correspondence between Mr. Hubbard and Sara?

21 A Yes.

22 Q Who was Sara?

23 A Sara was L. Ron Hubbard's second wife.

24 Q And this correspondence came from what period,
25 do you know?

26 A Maybe 1945 through 1952.

27 Q And do you recall approximately the volume of
28 these letters, how many?

1 A. The Sara documents relating to Sara Northrup,
2 Sara Hubbard, were contained in various binders. To my
3 recollection there was one just of correspondence, but it
4 also included correspondence between John W. Parsons and Sara
5 and Sara and somebody else, that sort of thing. So it's just
6 not the Hubbard, the two of them back and forth.

7 The other -- there was another file on Hubbard's
8 divorce from Sara, and then there was another file which was
9 Sara's notebook, some of her writings, and there may have been
10 more files in which she was mentioned, or there may be a
11 document relating to her in these files.

12 Those are the three main files, all of which I
13 handled in basically the same way as what we've covered.

14 Q. Where did you obtain these? What were the source
15 of these documents?

16 A. Part of it came from the Del Sol archives, part
17 of it from the Pers Sec archives, some of it from Worldwide
18 archives. Little bits of pieces from each place.

19 Q. And then did you similarly provide copies of
20 these to Mr. Garrison?

21 A. Yes.

22 Q. Did you read these letters and the various
23 related documents?

24 A. Most of them.

25 Q. Then did you obtain copies from Mr. Garrison
26 subsequent to leaving the church?

27 A. It's very possible.

28 Q. Do you recall sending any of these materials,

1 Sara letters and related documents, to Mr. Flynn?

2 A. It's possible.

3 Q. You don't recall specifically whether you did
4 send those to Mr. Flynn?

5 A. The same thing would apply. It would have been
6 in this bunch of materials. They would have been copies of
7 whatever Omar had, and they just would have been sent off along
8 with several thousand other documents.

9 Q. Now, let me get clear on one point. You sent
10 materials to Mr. Flynn several times over a period of several
11 months. Did you consciously choose certain documents to send
12 him initially and pick those out and send them off for a
13 particular reason and then later send the rest of them, or
14 did you make some kind of distinction between what you sent or
15 didn't send at a particular point?

16 A. I believe throughout the first -- I don't recall
17 the exact sequence that things were sent in, but I did -- I
18 don't know if there was any particular sequence.

19 Q. Here's my question --

20 A. Nothing comes quite to mind, but go ahead.

21 Q. If you have all these documents sitting there,
22 and you send some of them to Mr. Flynn, did you arbitrarily
23 pick out documents to send to him, or did you say, "I'm going
24 to send this one and this one," and select which ones would
25 be sent?

26 A. No. I would have sent them in -- in basically
27 in chunks. I think I -- I was selective at first, you know,
28 more selective at first than what it finally ended up with.

1 Q. And what was your criterion at first choosing
2 certain documents?

3 A. I felt like certain documents best -- best
4 showed what I had gone through and were perhaps the documents
5 which I most wanted to get rid of in a hurry. I think initially
6 I didn't send him many documents. I think that in the following --
7 the next time I sent a large bundle and the -- I think -- to
8 my recollection the final bunches were ones which Omar gave to
9 me separately like the O'Brien -- I think all the O'Brien
10 letters fit into that category.

11 Q. Can you explain what you mean by Mr. Garrison
12 giving you these separately.

13 A. Right. They were not documents which I then had
14 or was working with, but which I felt were important evidence
15 and which he offered to give me. So there was a sequence, a
16 point at which I don't have anything, and Omar gives me some
17 things.

18 Q. And when you are talking in context of Omar
19 giving you certain things, is that in response to your request
20 for certain documents?

21 A. Basically it -- Omar, you know, said in as many
22 words that he wanted me to have what I needed for my defense.
23 I couldn't recall every document and to send perhaps fifty to
24 eighty thousand just was not doable; it was ridiculous. So I
25 asked him for certain things.

26 Q. We were discussing earlier the wartime diary of
27 Mr. Hubbard. Were there any other diaries that you obtained
28 during the course of your archives work, diaries or journals

1 or similar types of documents?

2 MS. DRAGOJEVIC: Journals of Mr.. Hubbard?

3 BY MR. MAGNUSON:

4 Q Of Mr. Hubbard.

5 A Perhaps what would fit into that classification
6 are what I would call the Asia diary or Asia diaries. My
7 recollection there was one which I perceived as sort of a not --
8 probably not very factual account of traveling around in the
9 Samoans, Samoans or some other chain of islands in the Pacific.

10 The other set, the Asia diary, is probably a --
11 both of these things are very brief, not many pages.

12 Q Approximately how many pages each?

13 A I don't know. One may be 50, one may be similar
14 or even 100. So there were some writings like that. There
15 were none that were on the -- that were as big a day-to-day
16 kind of personal writing as the wartime journal.

17 Q But these were personal thoughts, notes,
18 observations of Mr. Hubbard?

19 A Right. It was either a manuscript or personal
20 thoughts.

21 Q And did you use the same procedure that you've
22 described earlier in how you dealt with these documents?

23 A Yes.

24 Q You made copies of them, transferred a copy to
25 Mr. Garrison, left the originals in the archives?

26 A That's correct.

27 Q Do you recall where you obtained these two
28 diaries?

1 A. Those came from -- so those came from Del Sol
2 to the best of my recollection.

3 Q And did you transfer those to Mr. Garrison as
4 well --

5 A. Yes.

6 Q -- copies?

7 And did you obtain those again from
8 Mr. Garrison subsequent to leaving the church?

9 A. It's possible. If Omar had designated them as
10 important or wanted them copied, then I would have copied
11 them.

12 Q Do you specifically recall whether you copied
13 these documents or not?

14 A. No.

15 Q Do you recall whether you sent copies of these
16 documents to Mr. Flynn?

17 A. If I did, they would have been amongst all the
18 other copies which were sent.

19 Q Have you ever received any copies from
20 Mr. Flynn relating to Scientology, Mr. Hubbard?

21 MS. DRAGOJEVIC: Excuse me, copies of what? Archives
22 documents or copies of --

23 BY MR. MAGNUSON:

24 Q Well, have you ever received -- yes, archives
25 documents.

26 MS. DRAGOJEVIC: What point in time?

27 BY MR. MAGNUSON:

28 Q Between the time you left the church and today.

1 A. Let me get this straight. Have I received
2 back from Mr. Flynn anything that I delivered to him or
3 anything that I recognize as at one time being in the Hubbard
4 archives?

5 Q. That's right.

6 A. No.

7 Q. Have you received other documents other than
8 the archives documents relating to Mr. Hubbard, Scientology,
9 from Mr. Flynn in the same time period?

10 A. Yes.

11 Q. What kinds of materials were those?

12 A. Oh, let me think. I don't -- I don't recall.
13 I think it is a -- it may be from the Clearwater commission,
14 a duplication of that junk.

15 Q. Of a transcript or materials that were submitted
16 in connection with that commission?

17 A. I think it was materials, all the materials,
18 or some of them from that thing.

19 Q. Any other materials that you can recall that you
20 received from Mr. Flynn?

21 A. No.

22 Q. When did you receive those commission --

23 A. When you say "materials from Mr. Flynn," do you
24 mean any declaration he sent me, any letters he sent me, any --

25 MS. DRAGOJEVIC: He said materials regarding
26 Scientology or Mr. Hubbard.

27 THE WITNESS: Anything -- I mean that's the business.
28 You know, it's like we don't talk about basketball.

1 BY MR. MAGNUSON:

2 Q So in addition to the documents you've mentioned,
3 you have received other --

4 A Well, it's possible like a copy of the
5 declaration which he filed in the contempt hearing, you know,
6 and attachments. Undoubtedly there's things like that, but as
7 far as the archives go, I have never seen one shred back from
8 him.

9 Q Mr. Flynn submitted an affidavit in which he
10 states that has had in excess of 50 conversations with you.
11 Would that be your estimate?

12 MS. DRAGOJEVIC: Are we referring to the affidavit
13 filed in connection with the contempt hearing?

14 MR. MAGNUSON: Yes.

15 THE WITNESS: That would be --

16 BY MR. MAGNUSON:

17 Q Maybe --

18 A Well, you know, at least.

19 MS. DRAGOJEVIC: The difficulty I have is does he give
20 a time frame for the conversations? I don't remember what he
21 said in his affidavit. I mean -- and I don't know if Gerry
22 remembers specifically. He might be thinking of a time period
23 greater than Mr. Flynn wrote about in his declaration or less
24 than Mr. Flynn wrote about in his declaration. Maybe you can
25 quote from it or something.

26 MR. MAGNUSON: Let me see if I can find it. He states,
27 page 23 of his affidavit: "With regard to what I call in the
28 speech Hubbard's 'diary' regarding what Armstrong called

1 'Mr. Hubbard's affirmations,' that information I received from
2 Mr. Armstrong in numerous, perhaps in excess of 50 conversa-
3 tions with him about that subject matter."

4 It doesn't have a time frame.

5 MS. DRAGOJEVIC: But it has subject matter.

6 MR. MAGNUSON: It has a subject matter.

7 Q Is that consistent --

8 A So what was the question? Did Michael Flynn
9 speak to me 50 times about affirmations?

10 Q Well, let's first say, have you had 50
11 conversations with Michael Flynn at all?

12 A Yes.

13 Q More than 50?

14 A Probably.

15 Q Have you discussed affirmations with Mr. Flynn
16 more than 50 times or approximately 50 times?

17 A The word or the concept or the existence of
18 those things?

19 MS. DRAGOJEVIC: Just say yes or no, Gerry, because --

20 THE WITNESS: Well, his question is completely broad.
21 If I answered that yes or no, it would sound like I was having
22 discussions with him, and it may have been a word, so I don't
23 want it to look like that's the case. If on the other hand I
24 said no, it would look like I never talked to him about it.
25 So there have been brief mentions and perhaps long mentions.

26 BY MR. MAGNUSON:

27 Q Let's do it this way. Separate conversations.
28 Separate time and place.

1 MS. DRAGOJEVIC: Wait, wait, wait.

2 BY MR. MAGNUSON:

3 Q How many separate conversations regarding
4 affirmations have you had with Mr. Flynn?

5 A I feel if I say I had 50 conversations about
6 that it sounds like that was the topic of conversation.

7 Q It does indeed.

8 A It blows it out of proportion. On 50 occasions.
9 Perhaps 50, I don't know, the subject has been either
10 mentioned or referred to --

11 Q Let me ask it this way: You have discussed a
12 number of times the subject of affirmations with Mr. Flynn; is
13 that accurate?

14 A Yeah.

15 Q Did Mr. Flynn ask you to send him documents
16 relating to affirmations?

17 MS. DRAGOJEVIC: I --

18 MR. MAGNUSON: I think he's opened it up by putting it
19 in this affidavit.

20 MS. DRAGOJEVIC: Opened what up?

21 MR. MAGNUSON: If you are going to object on attorney-
22 client grounds, the Flynn affidavit has opened the door to
23 discussion, at least of this subject. He's already put in
24 affidavit form conversations he's had with Mr. Armstrong on
25 the subject.

26 MS. DRAGOJEVIC: Well, I think that in considering
27 whether the attorney-client privilege may or may not be waived,
28 one must consider the amount of information that has been

1 disclosed, if any. And from my understanding of what you have
2 just read into the record from his affidavit, that to me would
3 not signify sufficient information as having been released by
4 Mr. Flynn to waive the attorney-client privilege here.

5 If perhaps he would have said, "Gerald Armstrong
6 and I had 50 or more conversations regarding affirmations, and
7 this is what we discussed," then maybe there would be some
8 waiver of the attorney-client privilege. But in this
9 situation I would have to disagree with you, and I'm going to
10 have to object to any questions inquiring into the nature or
11 subject matter of those conversations and instruct
12 Mr. Armstrong not to answer the questions because I do not
13 believe that there has been a sufficient divulgement, for lack
14 of a better word, of the subject matter of the conversations
15 on affirmations.

16 BY MR. MAGNUSON:

17 Q. Have you provided any documents or copies of
18 documents which had originally come out of the archives to
19 Bent Corydon?

20 MS. DRAGOJEVIC: It's vague as to time.

21 THE WITNESS: But it's no anyway. I just haven't.

22 BY MR. MAGNUSON:

23 Q. Have you discussed the content of any of these
24 documents since leaving the church with Mr. Corydon?

25 A. Probably. Again, I never went into it in any --
26 I can't recall going over any particular document in depth,
27 but I definitely have gone through the picture that was
28 presented to me, the fact that -- how the documents differ from

1 what has been the PR line of Hubbard and the organization. So
2 I have had discussions with Bent Corydon, and I have referred
3 to the documents or -- you know, but not in any detail.

4 Q How many times since leaving the church have
5 you had that sort of discussion with Mr. Corydon, if you
6 recall?

7 A Maybe two or three.

8 Q Do you recall when these conversations took
9 place?

10 A Over -- I recall once we talked at some length
11 by phone. I recall once when I went to his place, to his
12 home. That's the first time I think we ever met. And there
13 was one time when I met with him and some other people at the --
14 what they call the Riverside Mission, and various people asked
15 me about the documents or -- more like what was my history in-
16 side, and what did I find out that caused me to change my
17 viewpoint regarding Hubbard. These would be the times when
18 the documents or the contents would have come up.

19 MR. MAGNUSON: Let me take a minute here.

20 (Brief recess.)

21 MR. MAGNUSON: All right. Let's continue.

22 THE WITNESS: Let's end.

23 BY MR. MAGNUSON:

24 Q We don't have long to go, not too much further.

25 Since leaving the church have you -- I have a
26 few people I want to ask you whether you have met with or
27 communicated with.

28 Since leaving the church, have you met with

1 Kingsley Wimbush?

2 A. Yeah.

3 Q. On how many occasions?

4 A. Once.

5 Q. When was that?

6 A. Maybe a month and a half to two months ago.

7 Q. Where did that meeting take place?

8 A. At my home.

9 Q. What did you discuss with Mr. Wimbush?

10 A. I discussed his experience since being kicked
11 out of the organization and prior, and I discussed my
12 experiences in being in and out.

13 Q. Did you show him any documents?

14 A. If there was any, they don't come to mind. I
15 don't -- archives documents I don't have any, so you can
16 isolate that, and I don't think there was anything else.

17 Q. What about Coralie Wimbush? Have you since
18 leaving the church met or communicated with her?

19 A. I don't know her.

20 Q. So your answer is no?

21 A. Right. Well, unless she's somebody that --
22 I don't know who she is so I couldn't positively say that.

23 Q. Marvin Price, have you since leaving the church
24 met or spoken with this individual?

25 A. I don't know him.

26 Q. So far as you know, you haven't met or spoken
27 with him?

28 A. That's correct.

1 Q Martin Samuels, have you since leaving the
2 church met or spoken with him?

3 A Not since that question was asked in an
4 earlier deposition and answered affirmatively.

5 Q How many times have you met with Mr. Samuels?

6 A I don't believe I ever met with him.

7 Q What form have you ever communicated with him?

8 A By telephone. I've answered all of these
9 questions before as to numbers and times and substance of
10 conversation.

11 Q Eddy Walters, have you met or spoken with him?

12 A Yes.

13 Q Have you met with him?

14 A Yes.

15 Q On how many occasions since leaving the church?

16 A Twice.

17 Q Can you give me the approximate dates.

18 A Once was in early May of 1982, and once was
19 sometime in June in 1983.

20 Q Did you provide Mr. Walters with any documents
21 on either of these occasions?

22 A No.

23 Q Did you discuss with Mr. Walters the content of
24 any of these documents?

25 A I don't believe so.

26 Q Have you met or spoken with David Jordan since
27 leaving the church?

28 A I have spoken to him.

1 Q. On how many occasions?

2 A. Maybe three or four.

3 Q. Were these telephone conversations?

4 A. Yes.

5 Q. Can you give me the approximate dates that
6 these took place.

7 A. Perhaps two months ago was the first time and
8 then a couple of times subsequently.

9 Q. Did you discuss with Mr. Jordan in these
10 telephone conversations the content of any of the archives
11 materials?

12 A. I don't believe that content came up, but rather
13 the significance of the documents as a whole, and that was just,
14 again, me relating to my history inside the organization and
15 outside and subsequent events that took place.

16 Q. I may have missed it, when was the most recent
17 conversation you had with him?

18 A. I would think maybe two weeks ago.

19 Q. Telephone conversations?

20 A. Yes.

21 Q. Have you ever met with George, Abigail or Gail
22 O'Neill?

23 A. Yes.

24 Q. On how many occasions since leaving the church?

25 A. On one occasion two days. That's how I would
26 call it, one occasion, but --

27 Q. A two-day meeting?

28 A. Yes. Basically, yes.

1 Q Did you provide in the course of these two days
2 of meetings any documents or copies of documents from the
3 archives?

4 A. No.

5 Q Did you view during those two days of meetings
6 any such documents --

7 A. No.

8 Q -- that had been provided by anybody else?

9 A. Provided by someone else?

10 Q That's right.

11 A. There was a document which was -- I had seen
12 earlier, or I believe I had seen earlier, which came from
13 Vaughn Young. I don't know who the original source on it is,
14 but that was -- Vaughn Young provided it to Omar Garrison, so
15 I had seen a similar one.

16 Q What was that document?

17 A. It had to do with information which had been
18 collected on Michael Flynn on the Rockefellers; it named some
19 of the Rockefellers and information obtained from Gail O'Neill
20 and information on the O'Neills.

21 Q Did this document have a name of any kind?

22 A. It probably did, but I don't recall what it was.

23 Q The document that you saw, do you know where it
24 came from? How it got to that meeting?

25 A. No.

26 Q One of the other people at this meeting brought
27 this document, and you saw it, recognized it as one you had
28 seen previously?

1 A. I believe it was the same one.

2 Q. Actually the same document?

3 A. No. But that I had no way of telling. My
4 recollection was not that good as to whether or not -- I
5 definitely cannot say if it was the same piece of paper as the
6 one that I --

7 Q That was my last question.

8 A. Yeah.

9 Q. To clarify --

10 A. I can't say that, and I also can't say that it's
11 exactly the same document simply because I would not have the
12 two to compare, but it appeared to be the same document or
13 contain basically the same information.

14 Q. I see. Do you know whether that document was
15 one you had provided to Mr. Garrison, or possibly a different
16 copy of that document had been provided to Mr. Garrison by you
17 when you were in your archives post?

18 A. Well, to my recollection, Vaughn Young provided
19 it to Omar Garrison. That's how I recall the sequence of the
20 provision where -- that document came from what's called -- you
21 would call church archives, if there is such a piece. It would
22 be a B-1 or GO intelligence file. I never saw it come out of
23 there, but Vaughn was the organizational archivist who was
24 assigned to the biography project, and he delivered that to
25 Omar Garrison.

26 Q. Did he deliver that during the period that you
27 were still in the archives project, or was this after you had
28 left?

1 A. No. It was during the period when I was there.
2 There was a period of time in which we were both working on
3 archives.

4 Q. When you left the church, Mr. Young took your
5 place; is that right?

6 A. That's my understanding.

7 Q. When you were holding the archives post, do you
8 recall efforts being made on the part of certain people to
9 draft a new biography of L. Ron Hubbard? You don't understand
10 the question?

11 A. When you say "biography of L. Ron Hubbard,"
12 are you referring to the biographical sketches? Short?

13 Q. That's right, yes. Not a major --

14 A. As opposed to Garrison's biography?

15 Q. Exactly. Short biographical sketches to be used
16 in, perhaps, various ways.

17 A. Yes.

18 Q. And was an individual named Joe Burgess involved
19 in that project to write a biographical sketch?

20 A. Yes.

21 Q. And do you recall being consulted by Mr. Burgess
22 or others that were working on that same project regarding the
23 accuracy of the document that they were working on?

24 A. To some degree, yes.

25 Q. And do you recall efforts being made on the part
26 of those that were involved in that to produce an accurate
27 biography?

28 A. What I do recall is that it was my intention

1 throughout that period to get accurate biographical information
2 out into the public, and as a result of that effort Joe
3 Burgess was involved. First, there was Harvey Haber, then Joe
4 Burgess. I don't know whatever became of it so I don't know
5 if any of these efforts were successful.

6 Q. But isn't it true that Joe Burgess, perhaps
7 Julia Watson, perhaps others, checked with you on the accuracy
8 of certain information that they were contemplating putting
9 into these sorts of sketches?

10 A. That's correct.

11 Q. And that it was important to them to try to get
12 an accurate description? I mean that's why they talked to you
13 about it because you knew --

14 A. Right. Now, whether or not -- that's difficult
15 for me to answer. I don't know if they -- I can't understand
16 their motivation. I can't answer to that. For all I know,
17 they did that because I complained so long, and they didn't
18 want to hear me complaining anymore. But I don't know what
19 their motivation was, but they did send information to me for
20 cross-checking as to accuracy.

21 Q. Mr. Armstrong, it's accurate, is it not, to say
22 Sea Organization members are employed by the particular church
23 to which they are assigned, church or mission or other
24 Scientology organization?

25 A. I don't know how to answer that, what's the
26 practice of the organization.

27 Q. While you were a member of the Sea Organization,
28 was that the practice?

1 A. Well, it was a very confusing practice because
2 it was extremely difficult to ever know what you were part of.
3 For example --

4 Q. Let me ask this: It is accurate, is it not,
5 that Sea Organization members and non-Sea Organization members
6 worked side by side in various capacities within the church;
7 and the person you may be working with -- you may be a Sea
8 Organization member, and the person you were working with may or
9 may not be a Sea Organization member? That's true, isn't it?

10 A. Yes and no. It's -- for example, on the ship
11 there were only, to my understanding, Sea Org members who were
12 actual staff. However, students or pre-clears or people who
13 were paying for auditing or whatever were brought there. So
14 we were in that sense alongside non-Sea Org members.

15 Then, to amplify that, they had to sign on as
16 crew although they did not -- they were not crew. They were
17 there paying for their passage. We had to sign them on as
18 crew in order to get around the matter of yacht status because
19 if they didn't sign on as crew, then it wouldn't be a yacht,
20 and we would have had to have the ship inspected as to safety.

21 We were there, as you would put it, working
22 alongside Sea Org members who are crew, who are noncrew. So
23 it's confusing.

24 In another organization, let's take for example
25 Gilman Hot Springs. Again all Sea Org members, but it just
26 might happen that -- that, you know, maybe there is some wog
27 construction worker come on the project -- it means a subhuman.
28 But -- so there you could be working alongside of non-Sea Org

1 members.

2 In what they call outer organizations, you may
3 have non-Sea Org personnel working in or managing the
4 organization, and Sea Org people sent in on a mission,
5 something like that.

6 It's impossible for me to say what the
7 situation is until you get down to specifics.

8 Q So at the Cedars complex, while you were working
9 and living there, there were other people working in that same
10 building that were not Sea Org members; correct?

11 A I don't know of any who were not.

12 Q You don't know whether any of the people working
13 there were not Sea Org members?

14 A I can't answer that.

15 Q Okay.

16 A Omar Garrison had an office there. He wasn't
17 a Sea Org member.

18 Q So there is somebody that was not a Sea Org
19 member?

20 A But didn't you say "and living there"?

21 Q Not living necessarily. Working there.

22 A Yeah, when the garbage truck man drove up.

23 Q I'm talking on staff.

24 A On staff, that I can't answer. They may have
25 had non-Sea Org staff, but in none of the organizations where
26 I ever was.

27 MR. MAGNUSON: I'm just checking to see if I have any
28 more questions. Let me go off the record for a minute.

1 (Off the record.)

2 MR. MAGNUSON: All right. Back on the record. I have
3 no further questions.

4 MS. DRAGOJEVIC: I have no questions.

5 MR. MAGNUSON: Shall we stipulate that the court
6 reporter can be relieved of her responsibilities under the
7 Code of Civil Procedure; that the original can be provided to
8 counsel for Mr. Armstrong; that it may be signed under penalty
9 of perjury; if the original is not signed, a copy can be used
10 in lieu of the original -- how much time do you want to
11 finish?

12 THE WITNESS: 30.

13 MR. MAGNUSON: 30 days?

14 MS. DRAGOJEVIC: Actually that's very little, Gerry.
15 30 days is fine.

16 THE WITNESS: I'm a quick reader.

17 MR. MAGNUSON: So the original will be provided to
18 Ms. Dragojevic, and the deponent shall have 30 days to read and
19 sign the document and return it to my office.

20 MS. DRAGOJEVIC: So stipulated.

21 MR. MAGNUSON: Okay.

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5 STATE OF CALIFORNIA)
6) ss.
COUNTY OF LOS ANGELES)
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11 I, GERALD ARMSTRONG, having appeared for my
12 deposition on October 28, 1983, do this date declare under
13 penalty of perjury that I have read the foregoing
14 deposition, I have made any corrections, additions, or
15 deletions that I was desirous of making in order to render
16 the within transcript true and correct, and

17 IN WITNESS WHEREOF, I have hereunto subscribed my
18 name this _____ day of _____, 1983.
19
20

21 _____
22 WITNESS
23
24
25
26
27
28

1 STATE OF CALIFORNIA)
2) ss.
3 COUNTY OF LOS ANGELES)
4

5 I, RUTH PERSKY, CSR No. 5673, a Notary Public in
6 and for the County of Los Angeles, State of California, do
7 hereby certify:

8 That prior to being examined, the witness named in
9 the foregoing transcript, GERALD ARMSTRONG, was by me duly
10 sworn to testify the truth, the whole truth, and nothing
11 but the truth.

12 That said transcript was taken before me at the
13 time and place therein set forth and was taken down by me
14 in shorthand and thereafter transcribed into typewriting
15 under my direction and supervision, and I hereby certify
16 the foregoing transcript is a full, true, and correct
17 transcript of my shorthand notes so taken.

18 I further certify that I am neither counsel for nor
19 related to any party to said action nor in anywise
20 interested in the outcome thereof.

21 IN WITNESS WHEREOF, I have hereunto subscribed my
22 name and affixed my official seal this 3rd day of
23 November, 1983.
24



Ruth Persky
27 Notary Public in and for the County
28 of Los Angeles, State of California

